

1 BARBARA ENLOE HADSELL, ESQ. [S.B. #086021]
2 bhadsell@hadsellstomer.com
3 DAN STORMER, ESQ. [S.B. #101967]
4 dstormer@hadsellstomer.com
5 LAUREN TEUKOLSKY, ESQ. [S.B. #211381]
6 lauren@hadsellstomer.com
7 HADSELL, STORMER, KEENY,
8 RICHARDSON & RENICK LLP
9 128 North Fair Oaks Avenue, Suite 204
10 Pasadena, California 91103-3664
11 Telephone: (626) 585-9600
12 Facsimile: (626) 577-7079

13 [Counsel For Plaintiffs Continued On Next Page]

14 Attorneys for All Plaintiffs

15
16 UNITED STATES DISTRICT COURT
17
18 NORTHERN DISTRICT OF CALIFORNIA
19
20

21 LARRY BOWOTO, et. al.,

22 Plaintiffs,

23 v.

24 CHEVRON CORPORATION, et al.

25 Defendants.

Case No: C 99-02506 SI

PLAINTIFFS' FINAL EXHIBIT LIST

Courtroom: 10, 19th floor
Judge: Honorable Susan Illston

Counsel for Plaintiffs (cont.)

THERESA TRABER, ESQ. [S.B.#116305]
tmt@tvlegal.com

BERT VOORHEES, ESQ. [S.B. #137623]
bv@tvlegal.com

TRABER & VOORHEES
128 North Fair Oaks Avenue, Suite 204
Pasadena, California 91103
Telephone: (626) 585-9611
Facsimile: (626) 577-7079

CINDY A. COHN, ESQ. [S.B.#145997]
cindy@eff.org
ELECTRONIC FRONTIER FOUNDATION
454 Shotwell St.
San Francisco, California 94110
Telephone: (415) 436-9333, Ext. 108
Facsimile: (415) 436-9993

RICHARD HERZ, ESQ.
rick@earthrights.org
MARCO SIMONS, ESQ. [S.B. #237314]
marco@earthrights.org
EARTHRIGHTS INTERNATIONAL
1612 K Street N.W., Suite 401
Washington, DC 20006
Telephone: (202) 466-5188
Facsimile: (202) 466-5189

MICHAEL S. SORGEN, ESQ. [S.B. #43107]
msorgen@sorgen.net
LAW OFFICES OF MICHAEL S. SORGEN
240 Stockton Street, 9th Floor
San Francisco, California 94108
Telephone: (415) 956-1360
Facsimile: (415) 956-6342

JOSE LUIS FUENTES, ESQ. [S.B.#192236]
jlf@wplc.net
SIEGEL & YEE
499 14th Street, Suite 220
Oakland, Ca 94612
Telephone: (510) 839-1200
Facsimile: (510) 444-6698

JUDITH BROWN CHOMSKY, ESQ.
jchomsky@igc.org
LAW OFFICES OF JUDITH BROWN
CHOMSKY
Post Office Box 29726
Elkins Park, PA 19027
Telephone: (215) 782-8367
Facsimile: (215) 782-8368

JENNIFER M. GREEN, ESQ.
jgreen@ccr-ny.org
CENTER FOR CONSTITUTIONAL RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
Telephone: (212) 614-6431
Facsimile: (212) 614-6499

PAUL HOFFMAN, ESQ. [S.B.# 71244]
hoffpaul@ix.netcom.com
SCHONBRUN, DESIMONE, SEPLOW,
HARRIS & HOFFMAN LLP
723 Ocean Front Walk
Venice, California 90210
Telephone: (310) 396-0731
Facsimile: (310) 399-7040

ROBERT D. NEWMAN, ESQ.
[S.B. #086534]
rnewman@wclp.org
LAW OFFICE OF ROBERT D. NEWMAN
3701 Wilshire Blvd., Suite 208
Los Angeles, California 90010
Telephone: (213) 487-4727
Facsimile: (213) 487-0242

ANTHONY DICAPRIO, ESQ.
ad@humanrightslawyers.com
RATNER, DICAPRIO & CHOMSKY, LLP
110 E. 59th Street
New York, NY 10022
Telephone: (212) 604 9466
Facsimile: (212) 604 9467

RICHARD R. WIEBE [S.B. #121156]
wiebe@pacbell.net
LAW OFFICE OF RICHARD R WIEBE
425 California Street, #2025
San Francisco, CA 94104
Telephone: (415) 433-3200
Facsimile: (415) 433-6382

PLAINTIFFS' FINAL EXHIBIT LIST

Attached hereto is Plaintiffs' Final Exhibit List.

Dated: October 27, 2008

Respectfully submitted,

HADSELL, STORMER, KEENY,
RICHARDSON & RENICK LLP

By /s/
Lauren Teukolsky
Attorneys for Plaintiffs

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1	C0049	C0049	Fax to Fabio Saturni, Stephen Chalvsky from T. Schull, June 1, 1998, Re: Parabe Platform Incident - Situation Update	Cotta	FRE 802		
1			Articles reviewed by David Prescott in advance of his deposition related to health effects of the Sea Empress Oil Spill	Prescott	Articles related to oil spill off the coast of Wales is irrelevant, waste of time. FRE 401-403.		
1	C117684	C2813	Declaration of Frank G. Soler in Support of Defendants' Opposition in Plaintiffs' Motion for Leave to File Eighth Amended Complaint and Motion in Limine for Application of Judicial and/or Equitable Estoppel, dated 1/31/06	Howard	Hearsay. FRE 802.		
1			Organization chart of Chevron Subsidiaries and Affiliates, dated 1/31/06	Freeman			
1			Expert Report of James Ian Ebert	Ebert			
1			Subpoena to Freed, dated 1/10/06	Freed	Waste of time. FRE 403.		
2	C0032	C0041	May 29, 1998 Handwritten Statement, September 3, 1998 Typed Statement	Cotta	FRE 802, 901 as to handwritten statement; FRE 802 as to typed statement		
2	C0061	C0066	Letter from CNL to Manby, dated June 29, 1998, re: The Parabe Incident - The Facts	Prescott			
2			Document entitled "Listing of Subject Matter Contacts"	Howard	Hearsay. FRE 802.		
2			Photographs, Exhibit C- Rendered Images of the Computer Model	Freed			
2			Plan Sheets	Ebert			
2			Index of Binders from Chevron Expert	Freeman	Irrelevant; waste of time. FRE 401-403.		
3	C0035	C0038	Series of statements, first of which is dated June 1, 1998	Cotta			
3			Handwritten notes of Mr. Howard, date range 5/23/1998-3/20/2000	Howard			
3			Expert Declaration of Ehud I. Ronn, dated 3/9/06 Bio & CV of plaintiffs' expert Ehud Ronn (report removed)	Ronn	Hearsay. FRE 802		
3	JE0045	ER073	Handwritten notes	Ebert	Hearsay. FRE 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
3	NF0251	NF0269	Report excerpts of Kevin Henry	Freeman	Hearsay. FRE 802		
3A	GF0001	GF0051	Various photos of the barge, platform, and different parts of each	Freed			
3B	GF0008	GF0090	Various computer rendered images of barge, platform, boats, and parts of each	Freed			
3C	GF0040	GF0107	Barge non linearity measure, with several other attached documents produced by Freed	Freed	No objection to GF 40, 43, 44, 46-50, 52-57, 67-68. Object to GF 58-66, 69-71, 91-107--FRE 401, 403, 802		
4	C0369	C0371	Parabe Incident, May 25-28, 1998, REDACTED	Cotta	Object to the extent it contains Opia/Ikenyan materials that are contrary to plaintiffs' representation to the Court FRE 401-403. (We did not receive a copy of the redacted version represented on the exhibit list).		
4			Expert Report of Neill W. Freeman, dated 1/9/06	Freeman			
4			Earnings Data sheet, "After-Tax Net Income Profit/(Loss) in Millions," date range 1996-1999	Howard	Profit summary is irrelevant and unduly prejudicial; hearsay. FRE 401-403, 802.		
4			Expert Report of Gary L. Freed, dated 1/7/06	Freed			
4	MB001	B12084	Daily Logs	Ebert			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
5	C17239	C17239	Organizational chart of Intercompany Account Balances- After Realignment, dated September 30, 1999	Howard	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5	C049406	C049409	Memo from Kirkland to Matzke etc., dated 5/8/98, re: Memorandum of Understanding Negotiation Update	Freeman	Letter regarding negotiations of reserves and operating expenses is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
5	C0188	C0197	Letter from Ribadu to Idowu etc., dated July 15, 1998, re: Opia and Ikenyan Meetings, with handwritten notes	Cotta	Letter and handwritten notes relating to Opia/Ikenyan are irrelevant, waste of time and prejudicial. FRE 401-403. Dupe of 1374 (Ribadu)		
5	GF0108	GF0340	Chevron Int'l Exploration & Production, Africa Travel Team (CATTeam)- Itinerary, dated 11/30/05	Freed	Waste of time. FRE 403.		
5			Measurements of the Seaway Orion	Ebert			
6			Document from Bryn Mawr Website, date viewed 11/28/05, re: David Prescott Associate Professor of Biology	Prescott	Hearsay. FRE 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
6	C1882	C1906	Chevron Nigeria Limited Report and Financial Statements, dated December 31, 1999	Howard	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
6	C042077	C042083	Intercompany Receivable/Payable Settlements	Freeman	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
6	GF342	GF350	Invoice for Z-Axis Corporation, dated 10/31/05, re: Job Name, Larry Bowoto V Chevron Corp	Freed			
6			11-by-17 Plan Sheets	Ebert			
7	C17318	C17323	Fax cover sheet, Dec. 23, 1998 to Joe Lorenz, Billy Watkins, Sola Omole, from Irwin, Re: Kaiama Declaration (attached)	Cotta	Fax dated 12/23/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 64 (Taylor), 80 (Kirkland), 435 (Uwaka) & 1374 (Ribadu)		
7	C1858	C1881	Chevron Nigeria Limited Report and Financial Statements dated 12/31/1998, re: profit and loss account for 1998, statement of accounting policies, report of directors	Howard	Irrelevant. FRE 401-402.		
7	C23463	C23463	Fixed Duration Assignment Offer from Schull to Davis, date signed 12/3/98	Freeman	1998 job assignment is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
7	C1786	B11837	CIT/CNL/COCNL Cooperation Agreement from Kirkland to Geagea, dated 11/8/96	Ronn	1996 crude sales agreement is irrelevant, confusing, too remote in time and would mislead the jury. FRE 401-403.		
7			Photographs	Ebert			
8	C0433	C0435	Fax from Perez to Lavington etc., dated 11/19/98, re: Front Page article from S.F. Chronicle	Cotta	With the exception of the quotes attributed to Tom Schull ("a very, very difficult situation," and "in the Niger Delta . . . government," and "machetes, clubs and knives.") the article is hearsay. FRE 802. Cumulative of other evidence. FRE 401-403		
8	C1834	C1857	Chevron Nigeria Limited Report and Financial Statements, dated December 31, 1997	Howard	Irrelevant; too remote in time. FRE 401-402.		
8	B11254	B11452	Worksheet, Chevron Products Company International Logistics and Trading FOB Cargo Purchase from CNL, dated 10/21/98, w/ hundreds of worksheets attached	Ronn	October 1998 crude purchases are irrelevant, remote in time and would mislead the jury. Hundreds of pages of irrelevant documents would cause undue delay. FRE 401-403.		
8			Photographs	Ebert			
8			Pages from Teukolsky Declaration and Summary of Key Figures in Support of Opposition to Motion for Summary Judgment	Freeman	Incomplete; hearsay; not based on personal knowledge; unduly prejudicial. FRE 106, 401-403, 602, 802.		
9	C0883	C0888	Chevron Nigeria Limited Request For Check, payment of funeral expenses in respect of the Parabe incident of May 28, 1998 (additional pages removed)	Cotta	FRE 401, 403, 408, 409		
9			Expert Report of Professor Louis T. Wells, Jr., dated 10/31/05	Freeman	Hearsay. FRE 802.		
9	C1810	C1833	Chevron Nigeria Limited Report and Financial Statements, dated December 31, 1996	Howard	Irrelevant; too remote in time. FRE 401-402.		
9	B11858	B11874	Memo from Derr to Matzke etc., dated 2/5/98, re: Executive Committee meeting report	Ronn	Memo to Executive Committee re: futures trading is irrelevant and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
9			Photographs	Ebert			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
10			Expert Report of Professor Louis T. Wells, Jr., dated 10/31/05	Freeman	Hearsay. FRE 802.		
10	C17517	C17518	Email from Haastrup to Simmons etc., dated 1/15/96, re: CNL rig incident- Jan 8	Cavalli			
11	C0039	C0041	Log of Parabe Situation, dated 5/25/98-5/28/98	Cavalli			
11	NF0002	NF0006	Larry Bowoto, et al. v. Chevron Corp, et al., Document List	Freeman			
12	C0938	C0939	Email from Hana to Fidler dated 5/29/98, 3:50 a.m., re: FW Parabe Statement and Wire Stories	Cavalli	Partial Dupe of 12, cumulative. FRE 401-403. Contains hearsay, information not based on personal knowledge. FRE 602, 802.		
12			Declaration of Walker C. Taylor in Support of Defendants Motion for Summary Judgment (Phase One), dated 5/23/03	Freeman	Hearsay. FRE 802.		
13	C0910	C0909	E-mails from Hana to Taylor etc., dated 5/29/98 7:16 am, re: RE: Parabe Field	Cavalli	Partial Dupe of 60 & 131, improper compilation of documents, will be confusing. FRE 401-403. Incomplete FRE 106. No objection to second page.		
13			Chart, Summary of Corporation Name Changes	Freeman	Chart improperly reflects relevant time period includes 1999. FRE 401-403.		
14			Chart, Summary of Corporation Name Changes, w/ handwritten notes	Freeman	Chart improperly reflects relevant time period includes 1999. FRE 401-403.		
15	C0411	C0411	Email from Schull to Bates etc., dated 5/29/98 11:32 am, re: CNL Parabe Production Platform Situation Update-Friday May 29th	Cavalli			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
15	C0742	C0742	Chevron Corporation Board of Directors Chart, dated 1998	Matzke	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
15			Declaration of Richard H. Matzke in Support of Defendants Opposition to Plaintiffs Motion for Leave to file Eighth Amended Complaint and Motion in Limine for Application of Judicial and/or Equitable Estoppel, dated 1/30/06	Freeman	Hearsay. FRE 802.		
16	B00001	B00012	Chevron Corporation Stockholders, Board of Directors Charts	Matzke	2000 organization charts prepared for informational purposes only for Chevron Corporation are irrelevant, unduly prejudicial and misleading due to corporate reformation in late 1998 and is too remote in time. FRE 401-403.		
16	C0917	C0917	Email from Schull to Kirkland, dated 5/30/98, re: FW: Missing Items, Parabe Incident	Cavalli			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
16	C0840	C0840	Excerpt from 1996 Annual Report, "Glossary of Energy and Financial Terms"	Freeman	Exhibit is irrelevant, unduly prejudicial and confusing. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
17	C0406	C0407	Letter from Matzke to Derr, dated May 29, 1998, re: Parabe Platform Update, with handwritten notes	Matzke			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
17	C0771	C0771	Excerpt from 1997 Annual Report, "Glossary of Energy and Financial Terms"	Freeman	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
18	C0456	C0457	Same as Exhibit 17, but without Handwritten Notes	Matzke	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401- 403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security- related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v.</i> <i>Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. <i>See Sonora Diamond</i> <i>Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v.</i> <i>Bestfoods</i> , 524 U.S. 51, 71-72 (1998); <i>see</i> <i>also Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
18	C0701	C0701	Excerpt from 1998 Annual Report, "Glossary of Energy and Financial Terms"	Freeman	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
19	C0455	C0454	Email from Loo to Wilcox etc., dated 5/29/98 3:29pm, re: FW: Parabe RHM Memo, and attached email chain	Matzke	Incomplete. FRE 106. Improper compilation of documents.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
19	C0635	C0635	Excerpt from 1999 Annual Report, "Glossary of Energy and Financial Terms"	Freeman	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
19	B11790	B11821	Excerpt of Deposition of Thomas J. Schull, dated 2/7/02	Ronn	Irrelevant, waste of time. FRE 401-403.		
20	C0046	C0048	Letter from Uwaka to Mukakperuo etc., dated 6/4/98, re: Report of Unlawful Trespass, Threat to Lives, Economic Sabotage, Armed Robbery, and Kidnap	Matzke	Dupe of 373 (Neku), 433 (Uwaka), 59 (Taylor), 190 (Lorenz). FRE 802		
20	C23460	C23461	MDC Personnel Proposal proposed by Matzke, dated 1/7/99	Freeman	1999 Management Development Committee proposal is irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
20	B11838	B11841	FOB Oil Sales Agreement Escravos Crude Oil, dated 1/17/01	Ronn	2001 crude sales agreement is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
21	C0050	C0053	Report from Neku to Uwaka, dated June 2, 1998, re: Invasion of CBL 101/Parabe Platform	Matzke			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
21	C049125	C049128	FOB Oil Sales Agreement Escravos Crude Oil, dated 1/17/01	Freeman	2001 crude sales agreement is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
21	B11842	B11857	Excerpt of Deposition of Russell Kinoshita, dated 12/6/05	Ronn	Irrelevant, waste of time. FRE 401-403.		
22	C0431	C0432	E-mail from Lavington to Matzke etc., dated May 28, 1998 10:00am, re: FW: WSJ - Nigerians Suit alleges Chevron Backed Attacks That Violated Human Rights	Matzke	Article is hearsay. FRE 802. Cumulative of other evidence. Prejudice outweighs any probative value. FRE 401-403		
22	C1787	C1801	Memo from CNL-London etc. to Kirkland etc., dated 9/30/96, re: CIT/CNL/COCNL Cooperation Agreement, w/ multiple sales agreements attached	Freeman	Memo re: 1996 crude sales agreement is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
23	C17094	C17095	Chart showing Intercompany Balances before and after Realignment, dated 7/31/1999	Matzke	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
23	C1168	C1173	Letter from Matzke to Derr etc., dated 1/26/98, re: Chevron Nigeria Futures Market Trading: Request for Corporate Approval	Freeman	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
24	C0909	C0909	E-mails from Taylor to Fidler etc., dated June 1, 1998, re: FW: Parabe Platform Incident-Situation Update	Matzke	Lacks personal knowledge. FRE 602. Cumulative of other evidence. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
25	C0372	C0383	Letter from Matzke to Derr etc., re: Response Letter On Concerns About Chevron Activities in Nigeria, with proposed response to Ambassador Young, REDACTED	Matzke	Defendants object to any discussion of the Opia/Ikenyan events as improper given plaintiffs representation to the Court that they did not intend to rely on such events. Additionally, they are not relevant to Parabe and are prejudicial given the discovery defendants were foreclosed from taking when plaintiffs discovery "new" facts. FRE 401-403. Letter from Andrew Young and from person asserting to have heard account of Parabe and Opia/Ikenyan from unnamed source are not authenticated FRE 901; not relevant and more prejudicial than probative FRE 401-403; the statements not based on personal knowledge, but hearsay accounts FRE 602, 802. Given the inadmissibility of the underlying letters, admitting any part of this exhibit would be confusing and misleading. FRE 401-403.		
26	C17408	C17409	Email from Haastrup to Lorenz etc., dated 10/26/98, re: RE: Nigeria/Parabe Response	Matzke	To the extent this relates to post-Parabe events it is irrelevant. It is also cumulative. FRE 401-403. It contains hearsay and information not based on personal knowledge. FRE 401-403.		
27	C0387	C0387A	E-mail from Mackie to Derr etc., dated November 10, 1998, re: Nigeria/Parabe draft 7	Matzke	Draft letter is irrelevant and cumulative of other evidence. FRE 401-403.		
28	C3225	C3225	Chevron Policy, "On Temporary International Assignment," dated 1/9/01	Schull	2001 policy is irrelevant, too remote in time and not evidence of specific agency. FRE 401-403.		
29			Declaration of Thomas J. Schull in Support of Defendant's Motion to Dismiss	Schull	FRE 802		
30	C17520	C17522	Fax dated 1/9/96 to Schull from "Bob S." with two-page attachment re: "Youth Group Rig Siege"	Schull			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
31	C17524	C17524	Fax, dated May 27, 1998, to Bates, Lorenz and Low from T.J. Schull Re: Parabe Production Platform	Schull	No objection, except FRE 401, 403, 802, 901 as to handwriting on first page		
32	C17526	C17526	Fax, dated May 27, 1998 to Chalvsky from T.J. Schull, Re: Parabe Production Platform, Situation Report	Schull			
33	C17525	C17525	Fax, dated May 27, 1998, to Bates Lorenz and Low, from T.J. Schull, Re: Parabe Production Platform, stamped "Received Int'l Relations"	Schull			
34	C0466	C0468	E-mail from Schull to Koelmel, etc. dated 5/28/98 re: FW: Parabe Field, with attachment entitled, "Statement by Chevron Nigeria Limited on the Invasion of NNPC/Chevron Offshore Parabe Production Platform"	Schull			
35	C0460	C0461	Email from Bates to Schull, etc., dated 5/28/98 re: Parabe Field	Schull	Not relevant because it is draft, no evidence it was used, cumulative, waste of time. FRE 401-403, hearsay, lack of personal knowledge FRE 602, 802		
36			Amended Notice of Deposition of Defendant ChevronTexaco Corporation (Part I) Pursuant to F.R.C.P.. 30(b)(6) dated 12/31/01	Cesnik	Deposition notice is irrelevant and would confuse the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
37	C1582	C1585	Chevron Policy Manual, Policy 2, Management, Compliance Procedures and Guidelines	Cesnik	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
38	C1664	C1665	Chevron Policy Manual Policy 322, External Relations Political Contributions	Cesnik	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
39	C1666	C1667	Policy 324, External Relations, Payments to Government Officials	Cesnik	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
40	C17594	C17630	Manual of Compliance Procedures and Guidelines	Cesnik	2001 Compliance manual is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. Bowoto, 312 F. Supp. 2d at 1240 (quoting Phoenix Canada Oil Co. v. Texaco, Inc., 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See Sonora Diamond Corp. v. Super. Ct., 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); U.S. v. Bestfoods, 524 U.S. 51, 71-72 (1998); see also Calvert v. Huckins, 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
41	C17749	C17762	Guidelines for Compliance with the Foreign Corrupt Practices Act dated 4/20/99, from COPI in San Ramon, CA	Cesnik	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158.		
42			Chevron Corporation's Response to Plaintiffs' Special Set of Interrogatories, Pursuant to Court Order of March 16, 2001	Cesnik	Exhibit is improperly designated. Proper procedure was to designate it as part of discovery designations. Irrelevant; confusing to the jury. FRE 401-403.		
43			ChevronTexaco Corporation's Supplemental Response to Plaintiffs' Special Set of Interrogatories Pursuant to Court Order of 3/16/01	Cesnik	Exhibit is improperly designated. Proper procedure was to designate it as part of discovery. Irrelevant; confusing to the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
44	C1778	C1779	E-mail from Walonen to Brown dated 3/10/97 re: FW: Mail Failure	Cesnik	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158.		
45	C1776	C1777	E-mail dated 4/29/97 from Walonen to Brown re: FCPA	Cesnik	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
46	C1682	C1684	Chevron Policy Manual, Policy 570, "Operating - Security: Security of Personnel and Assets"	Taylor			
47	C17517	C17518	E-mail from Haastrup to Kim Simmons dated 1/15/96 re: CNL Rig Incident - Jan. 8	Taylor			
48	C13253	C13254	E-mail from Corr to Anderson, etc. dated 2/12/96 re: Facilitating Payment	Taylor	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
49	C13256	C13257	E-mail from Corr to Walonen, etc. dated 6/17/96 re: Facilitating Payment	Taylor	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
50	C1778	C1779	E-mail from Walonen to Brown dated 3/10/97 re: FW: Mail Failure	Taylor	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
51	C1776	C1777	E-mail dated 4/29/97 from Walonen to Brown re: FCPA	Taylor	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158.		
52			Declaration of Scott Davis in Support of Defendant's Motion to Dismiss	Taylor	Rule 802		
53	C0462	C0462	E-mail from Schull to Lorenz, etc. dated 5/28/98, 10:50 a.m., re: Parabe Situation Press Release	Taylor			
54	C0458	C0459	E-mail from Lorenz to Schull, etc. dated 5/29/98, 8:50 a.m., re: Parabe Wires	Taylor	Newspaper articles are inadmissible hearsay not based on personal knowledge. FRE 602, 802.		
56	C0912	C0912	E-mail from Hana to Taylor, etc. dated 5/29/98 re: Texaco	Taylor	Email dated 5/29/98 and relating to Texaco platforms is irrelevant, waste of time. FRE 401-403.		
57	C0030	C0031	Letter from Ilaje Eight United Oil Producing Communities Association to CNL General Manager dated 5/24/98 re: Emergency Message to Tighten or Beef Up Security	Taylor			
58	C0297	C0298	May 28, 1998 letter to Commissioner of Police, Ondo State Command	Taylor	FRE 802, 901		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
59	C0046	C0048	Letter from Uwaka to Mukakperuo etc., dated 6/4/98, re: Report of Unlawful Trespass, Threat to Lives, Economic Sabotage, Armed Robbery, and Kidnap	Taylor	Dupe of 373 (Neku), 433 (Uwaka), 190 (Lorenz), 20 (Matzke). FRE 802		
60	C0910	C0910	E-mail from Joe Hana, May 29, 1998, to Scott Taylor, MacLeod, Re: Parabe Field	Taylor	Partial Dupe of 131 & 13; incomplete FRE 106.		
61	C0466	C0468	E-mail from Schull to Koelmel, etc. dated 5/28/98 re: FW: Parabe Field, with attachment entitled, "Statement by Chevron Nigeria Limited on the Invasion of NNPC/Chevron Offshore Parabe Production Platform"	Taylor			
62	C0938	C0941	Email from Hana to Fidler dated 5/29/98, 3:50 a.m., re: FW Parabe Statement and Wire Stories	Taylor	Partial Dupe of 12, cumulative. FRE 401-403. Contains hearsay, information not based on personal knowledge. FRE 602, 802.		
63	C17527	C17527	E-mail from Schull to Loo, etc. dated 6/1/98 re: Parabe Platform Incident Situation Update	Taylor			
64	C17318	C17323	Fax cover sheet, Dec. 23, 1998 to Joe Lorenz, Billy Watkins, Sola Omole, from Irwin, Re: Kaiama Declaration (attached)	Taylor	Fax dated 12/23/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 7(Cotta), 80 (Kirkland), 435 (Uwaka)		
65	C0913	C0915	Email from Omole to Connor, etc. dated 12/18/98 re: Ijaw Declaration	Taylor	Email strong dated 12/18/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 145 (Schull), 116 (Haastrup)		
66	C17324	C17325	Niger Delta Situation and Chevron Update, REDACTED	Taylor	Information regarding late 1998 Ijaw unrest is irrelevant and misleading. Reference to Opia/Ikenyan is prejudicial and irrelevant. Plaintiffs' may not mention Opia/Ikenyan absent responding to discovery into why those plaintiffs dismissed their claims. FRE 401-403. Cumulative of other evidence including 319. FRE 401-403. Handwritten notes are hearsay. FRE 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
67	C17338	C17341	Email from Macleod to Irwin etc. dated 1/21/99 re: Africa Communications Strategy	Taylor	This document post-dates Parabe and does not relate to Parabe and is irrelevant, a waste of time and has the potential to confuse the jury. FRE 401-403. It also contains hearsay that is not based on personal knowledge. FRE 602, 802		
68	C13362	C13392	Security Review Team Report dated 2/11/99, entitled "Security Review of CNL Field Locations."	Taylor	Security review dated Feb. 1999 unrelated to Parabe is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407. Dupe of 1012 (Pell)		
69	C2921	C2927	Contractor Service Agreement, CNL and McDermott-ETPM West and Globestar Engineering Co., Inc, dated 11/3/95	Kirkland	1995 document is too remote. FRE 401-403.		
70	C2928	C2936	Amendment to Contractor Service Agreement	Kirkland	1985 document is too remote. FRE 401-403.		
71	C3026	C3027	Amendment No. 6 to Contractor Service Agreement	Kirkland	1999 amendment to contract is irrelevant, too remote in time, and would confuse the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
72	C1058	C1069	Resolutions of the Executive Committee of Chevron Corporations, June 24, 1997	Kirkland	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
73	C1056	C1057	Letter from Derr to Matzke and others, dated 6/24/1997, re: Executive Committee meeting, proposed CNL US Dollar borrowing authority of up to \$100 million, increase in CNL's Naira borrowing authority, proposal to initiate discussions with the Nigerian government on alternative ways to finance the Gbokoda/Dibi Development project.	Kirkland	Exhibit is duplicative of 5202. FRE 403. 1997 letter re: financing is irrelevant, too remote and is not evidence of specific agency. Would confuse the jury and cause undue delay. FRE 401-403.		
74	C0184	C0185	Letter from Opia Community dated 6/6/1998 seeking compensation for pollution	Kirkland	Letter relating to Opia is irrelevant, waste of time, prejudicial; hearsay. FRE 401-403, 802; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
75	C0179	C0179	Note from Haastrup to Omole, dated June 15, 1998	Kirkland	Handwritten notes dated 6/15/98 related to Opia is irrelevant, waste of time and prejudicial. FRE 401-403; see also Emiko Dep., pp. 316-317. Dupe of 1074 (Emiko)		
76	C0188	C0188	Memo from Ribadu to Idowu etc., dated July 15, 1998, re: Opia and Ikenyan meetings	Kirkland	Opia/Ikenyan evidence that has no relevance to Parabe and that contains hearsay statement. FRE 401-403, 602, 802.		
77	C0194	C0197	CNL fax to Bola Phillips, re: Confirmation Reports on agreements with Opia and Ikenyan	Kirkland	Opia/Ikenyan evidence that has no relevance to Parabe and would be a waste of time and prejudicial. FRE 401-403.		
78	C0181	C0183	Handwritten note from Omole to Haastrup etc., dated 10/6/98	Kirkland	Notes dated 6/98 unrelated to Parabe is irrelevant, waste of time and prejudicial attempt to backdoor Opia/Ikenyan evidence. FRE 401-403.		
80	C17318	C17323	Fax cover sheet, Dec. 23, 1998 to Joe Lorenz, Billy Watkins, Sola Omole, from Irwin, Re: Kaiama Declaration (attached)	Kirkland	Fax dated 12/23/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 64 (Taylor), 7 (Cotta), 435 (Uwaka) & 1374 (Ribadu)		
83	C0442	C0444	Fax from Matzke to Derr, dated 1/20/99, re: Niger Delta Situation & Chevron Update, REDACTED	Kirkland	Opia/Ikenyan evidence that has no relevance to Parabe and would be a waste of time and prejudicial. FRE 401-403.		
84	C17324	C17325	Niger Delta Situation and Chevron Update, REDACTED	Kirkland	Information regarding late 1998 Ijaw unrest is irrelevant and misleading. Reference to Opia/Ikenyan is prejudicial and irrelevant. Plaintiffs' may not mention Opia/Ikenyan absent responding to discovery into why those plaintiffs dismissed their claims. FRE 401-403. Cumulative of other evidence including 319. FRE 401-403. Handwritten notes are hearsay. FRE 802		
85	C0011	C0011	Letter from Akinkuotu to Kirkland, dated 4/29/98, re: Protest by the Ilaje Citizens of Ondo State	Kirkland	Hearsay. FRE 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
86	C0012	C0015	Letter from Concerned Ilaje Citizens to CNL Managing Director, dated 4/9/98, re: You Have Grossly Cheated Us	Kirkland			
87	C0008	C1684	Chairman/MD's Office Routing List	Kirkland	Hearsay. FRE 802.		
88	C0451	C1777	Email from Haastrup to Anyigbo etc., dated 9/30/98, re: FW: Nigeria: Parabe Inquiry from Reuters	Kirkland	Hearsay, lack of personal knowledge, more prejudicial than probative. FRE 401-403, 602, 802.		
89	C17765	C17765	Personnel Announcement from Matzke to Officers and Department Heads- Corporation Heads of Operating Companies, dated 12/16/96, re: Scott Davis will assume the position of Manager- Reservoir Management in CNL, Lagos	Kirkland	1996 announcement of job assignment is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
90	C17763	C17763	Document Entitled "Fixed Duration Assignment Offer," dated 12/3/98, re: Manager- Operations	Kirkland	1998 job assignment is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
91	C17763	C17775	Document Entitled "Fixed Duration Assignment Offer," dated 12/3/98, re: Manager - Operations	Davis	1998 job assignment is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
92	C1591	C1592	Chevron Policy Manual, Policy 50, Crisis Management, effective date December 2, 1999	Davis	December 1999 policy is irrelevant, too remote in time and would mislead the jury. FRE 401-403, 407.		
98	C13324	C13327	Document entitled "Jan 1 - Jan 13, 1999, Diary, S. E. Davis," REDACTED	Davis	Diary dated Jan. 1999 unrelated to Parabe is irrelevant, waste of time and prejudicial attempt to backdoor Opia/Ikenyan evidence. FRE 401-403.		
99	C0030	C0031	Handwritten letter from Ilaje Eight to The General Manager, Public Affairs Dept., dated 5/24/98, re: Emergency Message: To Tighten of Beef Up Security"	Davis			
100			Declaration of Scott Davis in Support of Defendant's Motion to Dismiss	Davis	FRE 802		
101	C13320	C13323	Diary of S.E. Davis, dated 5/20/98-6/3/98	Davis	Dupe of 538 (Browne, Ray) FRE 401, 403 as to 5/21-5/23 and 6/1 to 6/3. No objection to remainder		
102	C13431	C13436	Minutes of Status Review Meeting, dated 12/8/99, re: Security Review Team Action Plan	Davis	Irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
103	C17776	C17777	Letter to Haastrup from Assangha dated 10/11/99, re: Temporary Foreign Assignment, A.O. Haastrup – 40682	Haastrup	1999 job assignment is irrelevant, too remote in time, unduly prejudicial and would mislead the jury. FRE 401-403.		
104	C17766	C17766	Letter from Edman to Deji Haastrup, dated December 15, 1995, re: Promotion	Haastrup	1995 letter re: job promotion is irrelevant, too remote in time, unduly prejudicial and would mislead the jury. FRE 401-403.		
105	C0012	C0014	Letter from Concerned Ilaje Citizens to The Managing Director CNL, dated 4/9/1998, re: You Have Grossly Cheated Us	Haastrup			
106	C0011	C0011	Letter from Akinkuotu to CNL Managing Director, dated 4/29/98, re: Protest by Ilaje Citizens of Ondo State	Haastrup	Partial dupe of 1431 (Omosaye) FRE 802		
107	C0001	C0003	Letter from Concerned Ilaje Citizens to the Military Administrator, dated 4/30/98, re: We are posed for action	Haastrup	Double hearsay. FRE 802. Dupe of 121 (Schull), 291 (Omole)		
108	C0004	C0007	Letter from Ilaje Eight to CNL Managing Director, dated 5/2/98, re: Position Paper of the Oil Producing Communities in Ilaje Land on the Illegal Activities and Nuisance of the So Called "Concerned Ilaje Citizens"	Haastrup			
109	C0009	C0010	Letter from Onyearugbulem to CNL- Managing Director, dated May 7, 1998, re: A Call for Action	Haastrup	Double hearsay. FRE 802. Dupe of 294 (Omole), 473 (Adebawo)		
110	C0016	C0017	Letter from Omole to Akinkuoto, dated 5/8/98, re: Protest by Ilaje Citizens of Ondo State	Haastrup			
111	C0018	C0019	Letter from Ilaje Eight United Communities to The General Manager Public Affairs Department Chevron Nigeria Limited re: Position Paper of the Recognized Groups/Communities in Chevron Operation Area of Ilaje land - Ondo State dated May 11, '998	Haastrup			
112	C0020	C0023	Minutes of Meeting Held with the Ilaje Concessional Group at OBE – Sedara Community Held on May 14, 1998	Haastrup			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
113	C0024	C0025	Letter from Concerned Ilaje Citizens to CNL Managing Director, dated 5/18/98, re: Your Disregard for Peace Moves	Haastrup	Dupe of 122 (Schull), 503 (Bowoto)		
114	C0026	C0029	Letter from Ilaje Eight to Onyearugbulem, dated May 22, 1998, re: Position Paper on the Illegality and Nuisance of the Concerned Ilaje Citizens Oil Politics	Haastrup			
115	C0030	C0031	Handwritten letter from Ilaje Eight to The General Manager, Public Affairs Dept., dated 5/24/98, re: Emergency Message: To Tighten of Beef Up Security"	Haastrup			
116	C0913	C0915	Email from Omole to Connor etc., dated 12/18/98, re: RE: Ijaw Declaration	Haastrup	Email dated 5/29/98 and relating to Texaco platforms is irrelevant, waste of time. FRE 401-403. Dupe of 56 (Taylor), 145 (Schull)		
118	C0884	C0885	Letter from Omole to Kirkland etc., dated 6/12/98, re: Negotiations with Ilaje RE-Parabe Incident	Haastrup	FRE 401, 403, 408, 802		
119	C17685	C17686	Log of Itsekiri takeover of Parabe from March 22-24, 1998	Schull			
120	C0008	C0010	Routing slip, with two-page document dated 5/7/98 entitled Office of the Military Administrator, Ondo State of Nigeria, "A Call for Action"	Schull	FRE 802		
121	C0001	C0003	Letter from Concerned Ilaje Citizens to the Military Administrator, dated 4/30/98, re: We are posed for action	Schull	Double hearsay. FRE 802. Dupe of 107 (Haastrup), 291 (Omole)		
122	C0024	C0025	Letter from the Concerned Ilaje Citizens, stamped received by CNL 5/25/98, General Manager, Public Affairs, CNL, entitled, "Your Disregard for Peace Moves"	Schull			
123			The Marginalisation of the Ilajes of Ondo State by Companies Prospecting for and Exploiting Crude Oil in the Area: A Case Study of Chevron (Nigeria) Limited	Schull	FRE 401, 403, 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
124	C0462	C0462	E-mail from Thomas Schull, sent May 28, 1998, Re: Parabe Situation Press Release	Schull			
125	C0463	C0465	Email from Lorenz to Bates etc., dated 5/28/98, re: Parabe Statement and Wire Stories	Schull	Articles are hearsay. FRE 802. Irrelevant to the extent statement was not distributed. Cumulative of other evidence. FRE 401-403		
126	C2888	C2888	Parabe Platform Update- San Ramon, CA, May 29, 1998, two-page letter to Derr from Matzke	Schull	The newspaper article is inadmissible hearsay not based on personal knowledge. FRE 602, 802.		
127	C0406	C0407	Letter from Matzke to Derr dated 5/29/98 re: Parabe Platform Update	Schull	Cumulative. FRE 401-403. Hearsay, lacks personal knowledge. FRE 602, 802.		
130	C0411	C0411	Email from Schull to Bates etc., dated 5/29/98, re: CNL Parabe Production Platform Situation Update- Friday May 29th	Schull			
131	C0910	C0911	E-mail from Joe Hana, May 29, 1998, to Scott Taylor, MacLeod, Re: Parabe Field	Schull	Partial Dupe of 60 & 13, incomplete FRE 106.		
132	C0454	C0454	E-mail from Lorenz to Libbey etc., dated 5/29/98, re: CNL Parabe Production Platform Situation Update- May 29th	Schull			
133	C0455	C0457	Email from Loo to Wilcox etc., dated 5/29/98, re: FW: Parabe RHM Memo	Schull	Irrelevant because exhibit is internal document and cumulative of other evidence including 4041. FRE 401-403		
134	C0077	C0078	E-mail from Deji Haastrup June 1, 1998, to Kirkland, Schull, Omole, Davis, etc., Re: Today's Ugbo Negotiation	Schull	Dupe of 187 (Lorenz) FRE 401, 403, 408, 409, 802		
135	C0909	C0909	E-mail from Scott Taylor, June 1, 1998, to Arnold Fidler, Re: Parabe Platform Incident-Situation Update, forwarding email from Schull	Schull	Lacks personal knowledge. FRE 602. Cumulative of other evidence. FRE 401-403		
136	C0049	C0049	Fax to Fabio Saturni, Stephen Chalvsky from T. Schull, June 1, 1998, Re: Parabe Platform Incident - Situation Update	Schull			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
137	C0428	C0430	E-mail from Cedric Lavington to Ray Wilcox etc., dated October 12, 1998, re: Reuters - Parabe article	Schull	The newspaper article is inadmissible hearsay not based on personal knowledge. FRE 602, 802. The threat of the lawsuit is a waste of time because the jury already knows there is a lawsuit and it is not probative of any issue in the litigation. FRE 401-403.		
138	C2903.2	C2910	Letter from Williams to Bullock, dated 8/19/98, re: response letter summarizing events w/ attached "Parabe Chronology"	Schull	Letter from person asserting to have heard account of Parabe from unnamed source is not authenticated FRE 901; not relevant and more prejudicial than probative FRE 401-403; the statements not based on personal knowledge, but hearsay accounts FRE 602, 802. Improper compilation, the overall document is not probative of plaintiffs' claims and would be a waste of time and more prejudicial than probative. It also contains hearsay not based on personal knowledge. FRE 401-403, 602, 802.		
139	C17375	C17377	KPFA Radio Transcript of September 30, 1998 Broadcast - Verna Avery Brown, anchor	Schull	Transcript is hearsay. Libby lacks personal knowledge. FRE 602, 802. Incomplete document. Prejudice outweighs possible probative value, if any. Cumulative of other evidence. FRE 401-403		
140	C0442	C0445	Fax from Matzke to Derr, dated 1/20/99, re: Niger Delta Situation & Chevron Update, REDACTED	Schull	Information regarding late 1998 Ijaw unrest is irrelevant and misleading. Reference to Opia/Ikenyan is prejudicial and irrelevant. Plaintiffs may not mention Opia/Ikenyan absent responding to discovery into why those plaintiffs dismissed their claims. FRE 401-403. Cumulative of other evidence including 319. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
141	C0436	C0437	E-mail from Lavington to Wilcox etc, dated November 18, 1998, re: FW: "latest on Parabe protest and media activity"	Schull	Comments on Chronicle and Guardian are hearsay. FRE 802. Prejudice that protest occurred and information regarding protest outweighs any potential probative value. Cumulative of other evidence. FRE 401-403		
142	C17342	C17342	E-mail from Lavington to Soper etc., dated November 18, 1998, re: Parabe/Nigeria	Schull			
143	C17346	C17348	E-mail from Fred Gorell, December 8, 1998, to Joe Lorenz, Re: Chevron Ecofile - Nigeria Interview Request	Schull	Cumulative of other evidence. Irrelevant because no evidence that interview occurred. Misleading. FRE 401-403. Summary of interview format is hearsay. FRE 802		
144	C0586	C0586	Chevron's Statement Regarding Seizure of Nigerian Parabe Offshore Platform, on printout from Chevron's web site dated 9/26/00	Schull			
145	C0913	C0915	E-mail from Omole to Connor etc., dated December 18, 1998, re: RE: ljaw Declaration	Schull	Email dated 5/29/98 and relating to Texaco platforms is irrelevant, waste of time. FRE 401-403. Dupe of 56 (Taylor), 116 (Haastrup)		
147	C0426	C0427	E-mail from Cedric Lavington to Sarah Loo, November 23, 1998, Re: Nigeria Articles, NYT & DJ	Schull	The newspaper article is inadmissible hearsay not based on personal knowledge. FRE 602, 802.		
148	C19451	C19451	E-mail from Joe Lorenz to Omole etc., dated 5/26/98 4:42 pm, re: Parabe Production Shut-In	Lorenz	Hearsay, lacks personal knowledge. FRE 602, 802.		
149	C19450	C19450	E-mail from Lorenz to Schull etc., dated May 28, 1998, 11:55 a.m., re: Wire Story	Lorenz			
150	C19449	C19449	E-mail from Joe Lorenz to Libbey etc., dated May 28, 1998 11:59 am, re: FW: Parabe Situation Press Release	Lorenz			
151	C19349	C19350	E-mail from Lorenz to Bates, dated 5/28/98 1:27 pm, re: FW: Chevron Nigeria	Lorenz	The newspaper article is inadmissible hearsay not based on personal knowledge. FRE 602, 802.		
152	C19351	C19354	Email from Lorenz to Taylor, dated 5/28/98 5:06 pm, re: FW: Parabe Statement and Wire Stories	Lorenz	The newspaper article is inadmissible hearsay not based on personal knowledge. FRE 602, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
153	C19355	C19358	Email from Lorenz to Pryor etc., dated 5/29/98 8:28 am, re: FW: Parabe Statement and Wire Stories	Lorenz	The newspaper article is inadmissible hearsay not based on personal knowledge. FRE 602, 802.		
154	C19368	C19369	E-mail from <unknown> to Pryor etc., dated 5/29/98 8:28 am, re: FW: Parabe Media Statement and Wire Stories	Lorenz	The newspaper article is inadmissible hearsay not based on personal knowledge. FRE 602, 802.		
155	C0912	C0912	Email from Hana to Taylor etc., dated 5/29/98 9:14 am, re: Texaco	Lorenz	Irrelevant, waste of time. FRE 401-403.		
156	C19364	C19366	Email from Lorenz to Wilcox, dated 5/29/98 10:46 am, re: Parabe RHM Memo Update	Lorenz			
157	C19361	C19363	E-mail from Lorenz to Bates, dated 5/29/98 10:47 am, re: FW: Parabe RHM Memo	Lorenz			
158	C0453	C0453	E-mail from Tom Schull to Sarah Loo, etc., dated 6/1/98 4:47 am, re: Parabe Platform Incident-Situation Update	Lorenz			
159	C0410	C0410	E-mail from Schull to Loo etc., dated 6/1/98, re: Parabe Platform Incident-Situation Update, REDACTED	Lorenz	Correspondence by CNL employee is hearsay. FRE 802. Cumulative of other evidence including 4942 FRE 401-403		
160	C19359	C19359	Email from Lorenz to Williams etc., dated 6/1/98, re: FW: Parabe Platform Incident-Situation Update	Lorenz	Lorenz email is hearsay. FRE 802. Cumulative of other evidence. FRE 401-403		
161	C19360	C19360	Email from Lorenz to Libbey etc., dated 6/1/98, re: FW: Parabe Platform Incident-Situation Update	Lorenz	Cumulative of other evidence. FRE 401-403		
162	C0057	C0058	Parabe Crisis - The Facts, events dated May 25-28 1998	Lorenz	Hearsay, lack of personal knowledge. FRE 602, 802.		
163	C0901	C0902	The Parabe Crisis-The Facts- summary, dated 6/5/98	Lorenz	Cumulative of other evidence. FRE 401-403		
165	C17687	C17688	Itinerary for the Visit of Messrs Warner Williams John Flynn, Joe Lorenz, Luddy Hayden and Ray Tucker- Sunday, June 28-Wednesday, July 1, 1998 (Scenario Planning Meeting)	Lorenz	Irrelevant and waste of time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
166	C19378	C19378	Email from Lorenz to Omole, dated 8/11/98, re: Shell's ERA Response	Lorenz	Except for third paragraph, this email is irrelevant. FRE 401-403. The attachment, which relates to Shell, is irrelevant and a waste of time, hearsay, and not based on personal knowledge. FRE 401-403, 602, 802.		
168	C17952	C17969	North Offshore Morning Report, dated May 20, 1998 - June 6, 1998	Harrison	Dupe of 5379, 266 (Mitchell) & 1091 (Hervey). FRE 401, 403 as to 5/20 to 5/24, 6/2 to 6/6; no objection to remainder		
169	C17779	C17835	Drilling Activity Report, dated 5/25/1998 - 1/12/1999	Harrison	Partial Dupe of 5374. FRE 401, 403 as to all dates outside of 5/25/98 to 6/1/98		
170			Drawing made by the witness	Harrison	Drawing of drill casing is irrelevant, waste of time and prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
171	C17836	C17874	COPI Weekly Drilling Report - Distribution List, Week of 5/26/98 - 6/1/98	Harrison	Dupe of 5372. FRE 401, 403		
172	C17875	C17891	ChevronTexaco Daily Drilling Report, dated 10/8/2002 re: Operator status of operations	Harrison	2002 drilling report is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
173	C17892	C17918	ChevronTexaco Operations Summary Report dated 4/15/1998 - 5/2/2000, re: cumulative costs and 24hr summaries	Harrison	Dupe of 5375. FRE 401, 403		
174	C17919	C17951	COPI Weekly Drilling Report - Distribution List, Week of 12/28/98 - 1/3/99 re: weekly updates and summaries of each drilling location	Harrison	Late 1998-January 1999 drilling report is irrelevant, unduly prejudicial and an attempt to back door Opia and Ikenyan evidence. FRE 401-403. Duplicative of 517 (Weakley).		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
175	C1607	C1610	Chevron Policy Manual Policy 130, Financial Controls, Internal Controls	Guzdar	1995 policy on financial controls is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
176	C1611	C1613	Chevron Policy Manual, Policy 132, Financial Controls, Approval of Expenditures and Payment of Funds	Guzdar	1995 policy on financial controls is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
177	C1614	C1618	Chevron Policy Manual, Policy 134, Financial Controls, Auditing	Guzdar	1995 policy on financial controls is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
178	C17970	C17977	Guidelines for Compliance with the Foreign Corrupt Practices Act, re: Policies relating to Travel, gifts and entertainment expenses of Foreign Officials, Agreements and dealings with government officials, conflict of interest., dated 11/15/1996	Guzdar	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		
180	C19458	C19461	E-mail from Lorenz to Sheldon etc., dated 12/15/98, re: FW: News Highlights (Monday, Dec 14, 1998), REDACTED	Davis	Articles are hearsay. FRE 802. Information regarding late 1998 Ijaw crisis and Kaiama Declaration is irrelevant and misleading and also relates to Opia/Ikenyan. FRE 401-403. Cumulative of other evidence including 260 & 301. FRE 401-403		
182	C19053	C19057	E-mail from Lorenz to Taylor etc., dated 10/21/98, re: RE: Security Posture- CNL	Davis			
183	C17350	C17351	Letter to the Editor, San Francisco Bay Guardian, dated December 3, 1998, signed by Kirkland	Davis	Cumulative of other evidence. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
184	C0088	C0089	E-mail from Haastrup to Omole etc., dated July 24, 1998, re: Ilaje	Davis	Double hearsay. FRE 802. Offers to compromise or payment of expenses are barred when offered to show liability. FRE 408-409. Unduly prejudicial. FRE 403. Dupe of 475 (Adebawo)		
185	C19359	C19359	E-mail from Joe Lorenz to Warner Williams etc., dated 6/1/98, re: FW: Parabe Platform Incident-Situation Update, REDACTED	Lorenz	Lorenz email is hearsay. FRE 802. Cumulative of other evidence. FRE 401-403		
186	C19360	C19360	E-mail from Lorenz to Libbey etc., dated 6/1/98, re: FW: Parabe Platform Incident-Situation Update, REDACTED	Lorenz	Cumulative of other evidence. FRE 401-403		
187	C0077	C0078	E-mail from Deji Haastrup to Kirkland, Schull, Omole, Davis, June 1, 1998, Re: Today's Ugbo negotiation	Lorenz	Dupe of 134 (Schull). FRE 401, 403, 408, 409, 802		
188	C0050	C0053	Report from Neku to Uwaka, dated June 2, 1998, re: Invasion of CBL 101/Parabe Platform	Lorenz			
189	C0901	C0902	Document entitled, "Parabe Crisis - The Facts"	Lorenz	Cumulative of other evidence. FRE 401-403		
190	C0046	C0048	Letter from Uwaka to Mukakperuo etc., dated 6/4/98, re: Report of Unlawful Trespass, Threat to Lives, Economic Sabotage, Armed Robbery, and Kidnap	Lorenz	Dupe of 373 (Neku), 433 (Uwaka), 59 (Taylor), 20 (Matzke). FRE 802		
191	C0893	C0894	E-mail from Haastrup to Omole, June 11, 1998, Re: Ilaje Negotiations	Lorenz	FRE 401, 403, 408, 409, 802		
192	C19435	C19442	E-mail string, from Joe Lorenz to James Bates, July 15, 1998, re: FW: Nigeria	Lorenz	The attached environmental testimony is hearsay and unauthenticated. FRE 802, 602, 901. The rest of the document would be a waste of time and is more prejudicial than probative. FRE 401-403.		
193	C0196	C0196	Send Confirmation Report Public Affairs Dept., 7-16-98	Lorenz	Waste of time. FRE 401-403.		
194	C19413	C19416	E-mail from Lorenz to Omole etc., dated July 20, 1998, re: FW: Greenwash this, if you would	Lorenz	Note to ChevWeb is hearsay. FRE 802. Attachment is cumulative of other evidence including 1833. FRE 401-403. ail exchange concerning note on ChevWeb is irrelevant and prejudicial. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
195	C0061	C0067	Letter from Kirkland to Manby, dated 6/29/98, re: The Parabe Incident - The Facts	Lorenz			
196	C19031	C19034	E-mail from Lorenz to Omole etc., dated July 20, 1998, re: Chevrons Victims Seek Compensation/Compassion, including article from Punch entitled, "Chevron, Oil Communities Fail to Agree on Compensation Efforts"	Lorenz	FRE 401, 403, 802 (email and attachment)		
197	C19417	C19419	Email from Lorenz to Omole etc., dated 7/20/98, re: RE: Greenwash this, if you would	Lorenz	Email from person asserting to have heard account of Parabe from unnamed source is not authenticated FRE 901; not relevant and more prejudicial than probative FRE 401-403; the statements not based on personal knowledge, but hearsay accounts FRE 602, 802		
198	C19420	C19422	Email from Lorenz to Omole, dated 7/20/98, re: RE: Greenwash this, if you would	Lorenz	Email from person asserting to have heard account of Parabe from unnamed source is not authenticated FRE 901; not relevant and more prejudicial than probative FRE 401-403; the statements not based on personal knowledge, but hearsay accounts FRE 602, 802		
199	C0076	C0076	Letter from Matthews to Williams, dated 7/20/98, re: request for response	Lorenz	Improper compilation of documents. C0075 is from person asserting to have heard account of Parabe from unnamed source and is not authenticated FRE 901; not relevant and more prejudicial than probative FRE 401-403; the statement is not based on personal knowledge, but hearsay accounts FRE 602, 802. The attachments relating to the Kaiama declaration (C17318-323) are unrelated to Parabe, would be a waste of time and are more prejudicial than probative. FRE 401-403. They also contain hearsay and information not based on personal knowledge. FRE 602, 801.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
200	C19423	C19426	E-mail from Lorenz to Williams etc, dated July 21, 1998, re: Re: Greenwash this, if you would	Lorenz	Partial dupe of Ex. 201, those objections are incorporated here by reference. The balance of the document has little probative value and is more prejudicial than probative and a waste of time. FRE 401-403.		
201	C19427	C19428	E-mail from Lorenz to Mary Schaefer etc., dated July 21, 1998, re: RE: Greenwash this, if you would	Lorenz	Email from person asserting to have heard account of Parabe from unnamed source is not authenticated FRE 901; not relevant and more prejudicial than probative FRE 401-403; the statements not based on personal knowledge, but hearsay accounts FRE 602, 802.		
202	C19370	C19371	E-mail from Lorenz to Alison Jones etc., dated July 23, 1998, re: RE: Nigeria	Lorenz	Email from person asserting to have heard account of Parabe from unnamed source is not authenticated FRE 901; not relevant and more prejudicial than probative FRE 401-403; the statements not based on personal knowledge, but hearsay accounts FRE 602, 802.		
203	C19372	C19373	E-mail from Lorenz to Omole etc., dated July 23, 1998, re: FW: Nigeria	Lorenz	Email from person asserting to have heard account of Parabe from unnamed source is not authenticated FRE 901; not relevant and more prejudicial than probative FRE 401-403; the statements not based on personal knowledge, but hearsay accounts FRE 602, 802.		
204	C0068	C0073	Letter to Kirkland from Bronwen Manby, dated July 28, 1998, re: attached report from Environmental Rights Acton	Lorenz	C0069-73 is inadmissible hearsay that is more prejudicial than probative and is unauthenticated. FRE 401-403, 802, 901. C0068 is irrelevant because it occurred after the facts. FRE 401-403 and contains hearsay. FRE 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
205	C19429	C19434	E-mail from Lorenz to Warner Williams etc., July 30, 1998, re: Re: Parabe	Lorenz	Email from person asserting to have heard account of Parabe from unnamed source is not authenticated FRE 901; not relevant and more prejudicial than probative FRE 401-403. The statements made by unnamed person are not based on personal knowledge, but hearsay accounts FRE 602, 802. Attachment is cumulative of other evidence including 1833. FRE 401-403. Email exchange concerning note on ChevWeb is irrelevant and prejudicial. FRE 401-403		
206	C19374	C19377	E-mail from Lorenz to Omole etc., dated July 31, 1998, re: Ilaje Village - Part 2	Lorenz	Hearsay. FRE 802. Not relevant to claims or defenses. FRE 401-403. Declarant lacks personal knowledge FRE 602.		
207	C19452	C19453	Email from Lorenz to Omole etc., dated 8/4/98, re: Platt's story on Chevron's Ewan Field	Lorenz	Article is hearsay. FRE 802. Information about environmental impact assessment of Ewan is outside the time and geographic limits set by the Court in the in limine order regarding the environment. Prejudice far outweighs probative value, if any. Incorrect assertion about 5 deaths at Parabe is irrelevant and misleading. FRE 401-403		
208	C19454	C19457	E-mail from Lorenz to Omole etc, dated August 4, 1998, re: FW: Nigeria 2	Lorenz	Unrelated to Parabe or the Ilaje and therefore irrelevant and would be more prejudicial than probative and a waste of time. FRE 401-403. The email from "Neil g" is unauthenticated, irrelevant hearsay. FRE 602, 802, 901.		
209	C19378	C19385	E-mail from Lorenz to Omole, dated August 11, 1998, re: Shell's ERA Response	Lorenz	Except for third paragraph, this email is irrelevant. FRE 401-403. The attachment, which relates to Shell, is irrelevant and a waste of time, hearsay, and not based on personal knowledge. FRE 401-403, 602, 802.		
210	C19073	C19074	E-mail from Lorenz to Lavington, dated September 2, 1998, re: FW: Pacifica Radio - Warning	Lorenz	Waste of time and more prejudicial than probative. FRE 401-403. Hearsay and speculation. FRE 602, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
211	C19571	C19574	E-mail from Lorenz to Omole etc., dated Sept. 3, 1998, re: RE: Pacifica Radio	Lorenz	All attachments to the top email are hearsay and lack personal knowledge and are not relevant and would be a waste of time. FRE 602, 802, 401-403. Top email contains hearsay and would be a waste of time. FRE 802, 401-403.		
212	C0039	C0041	Log of Parabe Situation, dated 5/25/98-5/28/98	Lorenz			
213	C19071	C19072	E-mail from Lorenz to Williams, dated Sept. 4, 1998, re: RE: Pacifica Radio - Warning	Lorenz	Waste of time and more prejudicial than probative. FRE 401-403. Hearsay and speculation. FRE 602, 802.		
214	C19069	C19070	E-mail from Lorenz to Lavington, dated Sept. 8, 1998, re: FW: Pacifica Radio Interview	Lorenz	With respect to the 9/8/98 email from Sola Omole: Hearsay (sometime double or more), lacks personal knowledge (as to hearsay statements by Pacifica radio personnel) and more prejudicial than probative.. FRE 401-403, 602, 802.		
215	C19067	C19068	E-mail from Lorenz to Lavington, dated Sept. 9, 1998, re: Pacifica Radio Interview	Lorenz	With respect to the 9/8/98 email from Sola Omole: Hearsay (sometime double or more), lacks personal knowledge (as to hearsay statements by Pacifica radio personnel) and more prejudicial than probative.. FRE 401-403, 602, 802.		
216	C19575	C19578	E-mail from Lorenz to Libbey etc, dated Sept. 9, 1998, re: FW: Ilaje Village - Part 2	Lorenz	Hearsay. FRE 802. Not relevant to claims or defenses. FRE 401-403. Declarant lacks personal knowledge FRE 602.		
217	C0451	C0452	E-mail from Haastrup to Anyigbo etc., dated Sept. 30, 1998, re: FW: Nigeria Parabe Inquiry from Reuters	Lorenz	Hearsay, lack of personal knowledge, more prejudicial than probative. FRE 401-403, 602, 802.		
218	C19064	C19066	E-mail from Lorenz to Williams, dated 9/30/98, re: RE: Pacifica Radio Interview	Lorenz	Statements regarding percentage of COPI's earnings is not based on personal knowledge. FRE 602. Summaries of Pacifica radio interview and Sola's email are hearsay. FRE 802. Cumulative of other evidence including 1727. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
219	C19062	C19063	E-mail from Lorenz to Libbey etc., dated Oct. 1, 1998, re: RE: Nigerian e-mails	Lorenz	Email from person asserting to be consumer based on reactions to Pacifica radio broadcast are not authenticated FRE 901; it is not relevant and more prejudicial than probative FRE 401-403; the statements also are not based on personal knowledge, but hearsay accounts of the Pacifica broadcast FRE 602, 802.		
220	C19060	C19061	Email from Lorenz to Schaefer, dated 10/1/98, re: RE: Nigerian e-mails	Lorenz	Email from Mr. Barnett is hearsay as is the summary of that email. FRE 802. Irrelevant, misleading and a waste of time. Document is cumulative of other evidence including 1506. FRE 401-403		
221	C19002	C19002	E-mail from Lorenz to Irwin etc., dated Oct. 5, 1998, re: RE: Weekly Update	Lorenz	Cumulative and waste of time FRE 401-403.		
222	C19037	C19052	E-mail from Lorenz to Omole etc., dated Oct. 7, 1998, re: FW: Democracy Now Transcript	Lorenz	Entire interview is hearsay. FRE 802. Statements by Sola are irrelevant to plaintiffs' ratification theory because Sola is a CNL employee, not an employee of defendants. FRE 401-403. Cumulative of 1828 & 1020 & 5392. FRE 401-403		
223	C19568	C19570	E-mail from Lorenz to Libbey etc., dated Oct. 8, 1998, re: FW: Nigeria/Reuters Inquiry	Lorenz	Summaries of statements by Reuters reporter are hearsay. FRE 802. Information about Ijaw unrest is irrelevant and misleading. Information about environment is irrelevant and prejudicial and goes beyond the limits set by the Court's in limine order. To the extent the document contains information about Parabe it is cumulative of other evidence including 1019 & 1510 & 1744. FRE 401-403		
224	C19565	C19567	E-mail from Lorenz to Libbey etc., dated Oct. 15, 1998, re: RE: Production Stoppage in Nigeria	Lorenz	Information about late 1998 Ijaw unrest and Abiteye incident is irrelevant, misleading and waste of time. Cumulative of other evidence. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
225	C0388	C0389	E-mail from Lorenz to Yeager etc., dated Oct. 15, 1998, re: Parabe Web site statement	Lorenz	Cumulative of other evidence. FRE 401-403		
226	C19003	C19004	E-mail from Lorenz to Perez etc., dated Oct. 19, 1998, re: Parabe Response Letter, with attached Proposed response letter to concerned individuals who have contact Chevron	Lorenz	Cumulative of other evidence. Reference to protest letters is prejudicial. Draft letter is misleading. FRE 401-403		
227	C19012	C19013	E-mail from Lorenz to Ortwein, dated October 19, 1998, re: FW: CNL Parabe - 1st Draft	Lorenz	On C190013 entries for 9/3/98-10/12/98 are hearsay FRE 802; more prejudicial than probative, waste of time. FRE 401-403.		
228	C0446	C0450	E-mail from Ortwein to Bates, dated Oct. 19, 1998, re: Parabe Incident	Lorenz	On C 0447 entries for 9/3/98-10/12/98 are hearsay FRE 802; more prejudicial than probative, waste of time. FRE 401-403. On C0449 The Q&A relating to the environment is not relevant and is likely to confuse the jury and waste time. FRE 401-403. C0450 is not related to Parabe and relates to a later time period and a different tribe (the Ijaws). It is not relevant and would be a waste of time and confusing to the jury because it would result in a mini-trial of how that incident was the same and different from the Parabe incident. FRE 401-403.		
229	C19005	C19006	E-mail from Lorenz to Ortwein, dated Oct. 20, 1998, re: Parabe Incident	Lorenz	Incomplete document. FRE 106. Information regarding tribal unrest is irrelevant and misleading. Cumulative of other evidence. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
230	C19007	C19011	E-mail from Lorenz to Omole, dated Oct. 20, 1998, re: FW: Parabe Chronology and Q and A's	Lorenz	On C19009 The Q&A relating to the environment is not relevant and is likely to confuse the jury and waste time. FRE 401-403. C19010 is not related to Parabe and relates to a later time period and a different tribe (the Ijaws). It is not relevant and would be a waste of time and confusing to the jury because it would result in a mini-trial of how that incident was the same and different from the Parabe incident. FRE 401-403. On C19011 entries for 9/3/98-10/12/98 are hearsay FRE 802; more prejudicial than probative, waste of time. FRE 401-403.		
231	C19562	C19564	E-mail from Lorenz to Omole etc., dated Oct. 20, 1998, re: FW: Nigeria Q/A	Lorenz	Incomplete document. FRE 106. Cumulative of other evidence including 1749. Misleading and irrelevant references to pipeline explosion and environment. FRE 401-403		
232	C19053	C19057	E-mail from Lorenz to Taylor etc., dated 10/21/98, re: RE: Security Posture- CNL	Lorenz	Attachment is hearsay (C19056-57) and remarks about Joe Jakpa's role is hearsay. FRE 802. Irrelevant and/or information about the environment, Ijaw claims to Warri, crisis in Jones Creek and community relations. FRE 401-403. Cumulative of other evidence including 333. FRE 401-403		
233	C19559	C19561	E-mail from Lorenz to Mackie etc., dated Oct. 22, 1998, re: RE: Revised Nigeria letter	Lorenz	Reference to Saro Wiwa is irrelevant and misleading. Draft letter is irrelevant and cumulative of other evidence. FRE 401-403		
234	C19035	C19036	E-mail from Lorenz to Omole etc., dated Oct. 23, 1998, re: RE: Update-Community Situation	Lorenz	Relates to a crisis with the Ijaw in October 1998 and is not relevant to any claims or defenses and would be a waste of time. FRE 401-403		
235	C19557	C19558	E-mail from Lorenz to Haastrup etc., dated Oct. 26, 1998, re: FW: Nigeria Parabe, Response II	Lorenz	To the extent this relates to post-Parabe events it is irrelevant. It is also cumulative. FRE 401-403. It contains hearsay and information not based on personal knowledge. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
236	C19492	C19495	E-mail from Lorenz to Mackie, dated Nov. 10, 1998, re: RE: Nigeria/Parabe, draft 6	Lorenz	Statements attributed to Deji Haastrup are hearsay. FRE 802. Incomplete document. FRE 106. Prejudicial and cumulative of other evidence including 1746 & 1547. FRE 401-403		
237	C0387	C0387A	E-mail from Mackie to Derr etc., dated Nov. 10, 1998, re: Nigeria/Parabe, draft 7	Lorenz	Draft letter is irrelevant and cumulative of other evidence. FRE 401-403		
238	C19496	C19504	E-mail from Lorenz to Amador etc., dated Nov. 11, 1998, re: FW: Nigerian Oil Policy	Lorenz	Emails from persons asserting to be consumers based on their reactions to Pacifica radio broadcast are not authenticated FRE 901; they are not relevant and are more prejudicial than probative FRE 401-403; the statements also are not based on personal knowledge, but hearsay accounts of the Pacifica broadcast FRE 602, 802.		
239	C19514	C19516	E-mail from Lorenz to Houghton, dated Nov. 11, 1998, re: FW: Nigeria/Parabe, draft 7	Lorenz	Email draft of proposed letter is hearsay FRE 802, 602. It is not relevant to establishing plaintiffs' claims because it post-dates Parabe and does not prove ratification because plaintiffs have not established that the letter was actually circulated as written hear. It is a waste of time and not probative. FRE 401-403.		
240	C19517	C19520	E-mail from Lorenz to Lavington, dated November 11, 1998, re: FW: a new wrinkle	Lorenz	Article is hearsay. FRE 802. Cumulative of other evidence and prejudicial. FRE 401-403		
241	C19527	C19539	E-mail from Lorenz to Omole etc., dated November 11, 1998, re: FW: Corporate Watch Web site re: Chevron and Nigeria	Lorenz	The newspaper articles are inadmissible hearsay not based on personal knowledge. FRE 602, 802. The threat of the lawsuit is a waste of time because the jury already knows there is a lawsuit and it is not probative of any issue in the litigation (C19530). FRE 401-403 FRE 802. Prejudicial and misleading; to the extent there is information about Parabe it is cumulative of other evidence. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
242	C19659	C19660	E-mail from Lavington to Omole etc., dated Nov. 16, 1998, re: FW: SF Nigeria Protest next week	Lorenz	What Dave Sander heard about a protest is hearsay. FRE 802. Information regarding a possible protest is Irrelevant and prejudicial. FRE 401-403. Cumulative of other evidence including 1550 & 1521. FRE 401-403		
243	C0401	C0403	Letter to Mr. John Diaz from Kirkland, dated 11/20/98, re: Proposed rebuttal letter to SF Chronicle	Lorenz	Not relevant because no evidence it was published in this form and if it were it would be cumulative to actual publication. FRE 401-403. Hearsay, lack of personal knowledge FRE 602, 802.		
244	C0433	C0435	Fax from Perez to Lavington etc., dated 11/9/98, re: Front Page article from S.F. Chronicle	Lorenz	With the exception of the quotes attributed to Tom Schull ("a very, very difficult situation," and "in the Niger Delta . . . government," and "machetes, clubs and knives.") the article is hearsay. FRE 802. Cumulative of other evidence. FRE 401-403		
245	C19396	C19396	E-mail from Lorenz to Omole etc., dated November 20, 1998, re: FW: 11/20E Demonstration Scheduled for Noon Today in San Francisco	Lorenz	Irrelevant and more prejudicial than probative. FRE 401-403.		
246	C19646	C19651	E-mail memo from Soper to VanCamp etc., dated 11/20/98, re: FW: Nigeria finals	Lorenz	Cover email contains inadmissible hearsay. FRE 802. Post-Parabe events are irrelevant. FRE 401-403. Information relating to the environment is irrelevant and a waste of time FRE 401-403.		
247	C0445	C0445	Chevron Statement Regarding Seizure of Nigerian Parabe Platform- Final Draft, dated 11/20/98	Lorenz	Cumulative, waste of time. FRE 401-403.		
248	C19642	C19645	E-mail from Lavington to Fraser etc., dated Nov. 23, 1998, re: FW: Urgent SF Chron letter - Version 2	Lorenz	Cumulative, contains information that is hearsay and not based on personal knowledge. FRE 401-403, 602, 802.		
249	C19640	C19641	E-mail from Gorell to Derr etc., dated Nov. 23, 1998, re: FW: Nigeria letter	Lorenz	Cumulative, contains information that is hearsay and not based on personal knowledge. FRE 401-403, 602, 802.		
250	C19086	C19087	E-mail from Lorenz to Lavington etc., dated Nov. 23, 1998, re: SF Chron letter - Version 2	Lorenz	This is a partial duplicate of Exh. 548 and those objections are incorporated here by reference.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
251	C19678	C19680	E-mail from Soper to Lorenz etc., dated Nov. 25, 1998, re: Guardian Letter	Lorenz	Cumulative, contains information that is hearsay and not based on personal knowledge. FRE 401-403, 602, 802.		
252	C19106	C19108	E-mail from Lorenz to Guillory etc., dated Nov. 30, 1998, re: FW: Questions and Comments Form Submissions	Lorenz	Emails from person asserting to have heard account of Parabe from unnamed source is not authenticated FRE 901; not relevant and more prejudicial than probative FRE 401-403; the statements not based on personal knowledge, but hearsay accounts FRE 602, 802.		
253	C19104	C19105	E-mail from Lorenz to Lavington, dated Nov. 30, 1998, re: RE: Guardian Letter - Parabe	Lorenz	Contains hearsay and information not based on personal knowledge. FRE 602, 802.		
254	C19688	C19690	E-mail from Soper to Lavington etc., dated December 2, 1998, re: Guardian letter	Lorenz	Cumulative of 1534 & 1558. FRE 401-403. Soper email is hearsay. FRE 802		
255	C19101	C19103	E-mail from Lorenz to Gorell etc., dated Dec. 7, 1998, re: RE: Chevron Ecofile - Nigeria Interview Request	Lorenz	Cumulative of other evidence. Irrelevant because no evidence that interview occurred. Misleading. FRE 401-403. Summary of interview format is hearsay. FRE 802		
256	C19304	C19307	Email from Lorenz to Haastrup and others, dated 2/26/1999, re: HUMAN RIGHTS WATCH AFRICA REPORT	Lorenz	Cumulative of 1575. Reference to HRW report is prejudicial because report responded to Opia/Ikenyan. To the extent information relates to Parabe it is cumulative of other evidence. FRE 401-403. Correspondence by CNL employees is hearsay. FRE 802		
257	C19309	C19311	E-mail from Lorenz to Haastrup etc., dated Mar. 4, 1999, re: RE: Nigeria: encounter with German Journalist, REDACTED	Lorenz	Incomplete document. FRE 106. Prejudicial, misleading and irrelevant because reporter was researching Opia/Ikenyan and there are direct references to Opia/Ikenyan. Cumulative of other evidence including 1537. FRE 401-403		
258	C19313	C19313	E-mail from Lorenz to Gorell, dated Mar. 18, 1999, re: Nigeria Parabe Update	Lorenz	Contain hearsay that is not based on personal knowledge. FRE 802, 602.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
259	C19462	C19462	E-mail from Lorenz to Taylor etc., dated Dec. 14, 1998, re: Ijaw Grumbings	Lorenz	This document post-dates Parabe and does not relate to Parabe and is irrelevant, a waste of time and has the potential to confuse the jury. FRE 401-403. It also contains hearsay that is not based on personal knowledge. FRE 602, 802.		
260	C19458	C19461	E-mail from Lorenz to Sheldon etc., dated December 15, 1998, re: FW: News Highlights (Monday, Dec 14, 1998), REDACTED	Lorenz	Articles are hearsay. FRE 802. Information regarding late 1998 Ijaw crisis and Kaiama Declaration is irrelevant and misleading and also relates to Opia/Ikenyan. FRE 401-403. Cumulative of other evidence including 301 & 180. FRE 401-403		
261	C19131	C19131	E-mail from Lorenz to Libbey etc., dated Dec. 15, 1998, re: FW: Call from the Saturday Star of Joburg	Lorenz	This document post-dates Parabe and does not relate to Parabe and is irrelevant, a waste of time and has the potential to confuse the jury. FRE 401-403. It also contains hearsay that is not based on personal knowledge. FRE 602, 802		
262	C19130	C19130	E-mail from Lorenz to Sheldon etc., dated Dec. 17, 1998, re: FW: Ijaw unrest	Lorenz	Quote from newspaper report is hearsay. FRE 802. Information regarding late 1998 Ijaw unrest is irrelevant and misleading. FRE 401-403		
263	C19128	C19129	E-mail from Lorenz to Sheldon etc., dated Dec. 17, 1998, re: FW: Nigeria Issues	Lorenz	Email from Sola is hearsay. Mamadou's summary of what Texaco said is hearsay. FRE 802. Information regarding late 1998 Ijaw crisis is irrelevant and misleading. Potential probative value, if any, of email exchange is outweighed by its prejudice. FRE 401-403. Cumulative of other evidence including 302. FRE 401-403.		
264	C19126	C19127	E-mail from Lorenz to Low etc., dated Dec. 18, 1998, re: Turnover	Lorenz	Information regarding Ijaw unrest is irrelevant and misleading. To the extent there is information about Parabe it is either cumulative of other evidence or a waste of time. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
266	C17952	C17969	North Offshore Morning Report, dated May 20, 1998 - June 6, 1998	Mitchell	Dupe of 5379, 1091 (Hervey) & 168 (Harrison). FRE 401, 403 as to 5/20 to 5/24, 6/1 to 6/6		
267	C1858	C1877	Chevron Nigeria Limited Report and Financial Statements dated 12/31/1998, re: profit and loss account for 1998, statement of accounting policies, report of directors	Mitchell	Duplicative of Exhibits 5241 and 371 (Brown, Rick). FRE 403. Irrelevant. FRE 401-402.		
268	C3120	C3121	Document describing Purchase of Insurance Policy, re: Cekar & Jetheau	Mitchell	1999 insurance certificate is irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
269	C1621	C1655	Chevron Policy Manual, Policy 190, Delegation of Authority, effective 3/31/99, replaces 12/30/98	Mitchell			
270	C2881	C2882	Minutes of Special Meeting of the Executive Committee of Chevron Corp. dated 4/22/99	Mitchell	1999 Meeting Minutes are irrelevant and too remote in time. FRE 401-403.		
271	C19451	C19451	E-mail from Lorenz to Omole etc., dated May 26, 1998, re: Parabe Production Shut In	Williams	What Lorenz has been told is hearsay. FRE 802. Cumulative of other evidence including 278 & 1500. FRE 401-403		
272	C1183	C1187	Letter to Derr, dated 2-18-98, re: Gbokoda/Dibi Development Appropriation Request Supplement Approval	Bates	Duplicative of 5208. Memo re: work request is irrelevant and is not evidence of specific agency. It would mislead the jury and cause undue delay. FRE 401-403.		
272	C17523	C17526	Fax from Schull to Bates etc. dated May 27, 1998, re: Parabe Productions Platform Situation, with attached Fax from Schull to Chalvsky, dated May 27, 1998, re: CNL-Parabe Productions Platform Situation Report	Williams	Not legible, hearsay, lack of personal knowledge. FRE 106, 602, 802		
273	C0463	C0465	E-mail from Lorenz to Bates etc., dated May 28, 1998, re: Parabe Statement and Wire Stories	Williams	Articles are hearsay. FRE 802. Irrelevant to the extent statement was not distributed. Cumulative of other evidence. FRE 401-403		
273	C1014	C1030	Letter from Matzke to Derr dated 12-6-96, entitled Gbokoda/Dibi Development Appropriation Request Approval	Bates	Irrelevant time period and subject matter and waste of time FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
274	C0458	C0459	E-mail from Lorenz to Schull etc., 5/29/98 8:50 am, re: Parabe Wires	Williams	Articles are hearsay as are statements regarding summary of articles. FRE 802. Cumulative of other evidence. FRE 401-403		
274	C19762	C19765	E-mail from Lorenz to Bates etc., dated April 16, 1998, re: FW: Washington Post article	Bates	Inadmissible newspaper article, irrelevant FRE 401-403, 602, 802		
275	C19759	C19761	E-mail from Lorenz to Omole etc., dated April 16, 1998, re: NYT story	Bates	Inadmissible newspaper article, irrelevant FRE 401-403, 602, 802		
275	C19777	C19778	Email from Lorenz to Hayden etc., dated June 3, 1998, re: looking into flights to go to Nigeria	Williams	Irrelevant, post-Parabe activity, waste of time. FRE 401-403.		
276	C19779	C19780	Email from Lorenz to Omole etc., dated 6/8/98, re: FW: Reported death of Abacha	Williams	Inadmissible newspaper article, irrelevant FRE 401-403, 602, 802		
276	C17857	C17857	Weekly Drilling Report- Distribution List - Week of 5/26/98 - 6/1/98	Bates	Irrelevant FRE 401-403		
277				Bates	FRE 401, 403		
277	C19781	C19784	Email from Lorenz to Omole etc., dated June 8, 1998, re: FW: Nigeria: Expected Inquiries	Williams	Irrelevant post-Parabe information about Abacha's death. FRE 401-403. No personal knowledge, hearsay. FRE 602, 802.		
278	C19429	C19434	Email from Lorenz to Williams etc., dated 7/30/98, re: RE: Parabe	Williams	Email from person asserting to have heard account of Parabe from unnamed source is not authenticated FRE 901; not relevant and more prejudicial than probative FRE 401-403. The statements made by unnamed person are not based on personal knowledge, but hearsay accounts FRE 602, 802. Attachment is cumulative of other evidence including 1833. FRE 401-403. Email exchange concerning note on ChevWeb is irrelevant and prejudicial. FRE 401-403		
278	C19451	C19451	Email from Lorenz to Omole etc., dated 5/26/98 4:42 pm, re: Parabe Production Shutdown	Bates	What Lorenz has been told is hearsay. FRE 802. Cumulative of other evidence including 1500 & 271. FRE 401-403		
279	C17958	C17958	North Offshore Morning Report, May 26, 1998	Bates			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
279	C19868	C19871	E-mail from Lorenz to Omole etc., dated July 29, 1998, re: Nigeria Press Statements	Williams	Cumulative of other evidence including 282. FRE 401-403. Document is irrelevant, misleading and prejudicial to the extent it contains information that does not concern Parabe. The information relating to Parabe is cumulative of other evidence. Document is internal. FRE 401-403		
280	C19448	C19448	E-mail from Lorenz to Wilcox, dated May 29, 1998, re: FW: CNL Parabe Production Platform Situation update- Friday May 29	Bates			
280	C19875	C19875	E-mail from Lorenz to Williams, dated August 3, 1998, re: RE: Nigeria Press Statements	Williams	Post-Parabe document unrelated to the events, not relevant, waste of time FRE 401 403		
281	C19444	C19447	Document entitled "Draft Only, Lagos, Nigeria, October 8, 1998, Joe Lorenz, This is What We Recommend"	Williams	Not relevant because it is draft, no evidence it was used, cumulative, waste of time. FRE 401-403, hearsay, lack of personal knowledge FRE 602, 802		
281	C19444	C19447	E-mail from Lorenz to Loo, dated May 29, 1998 11:04 am, re: FW: Parabe Field	Bates	FRE 802 hearsay		
282	C19868	C19871	E-mail from Lorenz to Omole etc., dated July 29th, 1998, re: Nigeria Press Statements	Bates	Cumulative of other evidence including 279. FRE 401-403. Document is irrelevant, misleading and prejudicial to the extent it contains information that does not concern Parabe. The information relating to Parabe is cumulative of other evidence. Document is internal. FRE 401-403		
282	C19919	C19920	E-mail from Lorenz to Irwin etc., dated October 9, 1998, re: Africare Briefing Books	Williams	Cumulative of other evidence including 1512 & 1830. FRE 401-403		
283	C19452	C19453	E-mail from Lorenz to Omole etc., dated August 4, 1998, re: Platt's Story on Ewan	Bates	This exhibit is cumulative of Exhibit 207. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
284	C20452	C20456	Email from Ortwein to Bates, dated 10/19/98, re: Parabe Incident	Bates	Attachment regarding Ijaw unrest is irrelevant and misleading. Document is internal to Chevron so irrelevant. Cumulative of other evidence including 1517. FRE 401-403		
285	C19005	C19006	E-mail from Lorenz to Ortwein, dated October 20, 1998, re: RE: Parabe Incident	Bates	Incomplete document. FRE 106. Information regarding tribal unrest is irrelevant and misleading. Cumulative of other evidence. FRE 401-403		
286	C20319	C20320	E-mail from Chow to Fitzmorris etc., dated 11/19/98, re: Opuekeba Simulation & Well Plan	Bates	November 1998 email re: Opuekeba plan is irrelevant, unduly prejudicial and would confuse the jury. FRE 401-403.		
287	C19126	C19127	E-mail from Lorenz to Low etc., dated 12/18/98, re: Turnover	Bates	Information regarding Ijaw unrest is irrelevant and misleading. To the extent there is information about Parabe it is either cumulative of other evidence or a waste of time. FRE 401-403.		
288	C20422	C20423	Security-Community Relations Committee meeting: Issues, Agreements, and Deliverables - 3/12/98	Omole	Meeting minutes dated Dec. 3, 1998 is irrelevant, waste of time. FRE 401-403. 519 (Weakley) and 1034 (Mba)		
289	C17685	C17686	Log of Itsekiri takeover of Parabe from March 22-24, 1998	Omole			
290	C0924	C0931	Letter from Kirkland to Manby, dated 2/9/98, re: Human Rights Watch/Africa, Fifth Draft	Omole	Draft letter is irrelevant and misleading. Cumulative of other evidence. FRE 401-403. Any probative value of references to Opuama is far exceeded by prejudice. Other bad acts are inadmissible to show actions in conformity therewith. FRE 401-403, 404(b)		
291	C0001	C0003	Letter from Concerned Ilaje Citizens to the Military Administrator, dated 4/30/98, re: We are posed for action	Omole	Double hearsay. FRE 802. Dupe of 107 (Haastrup), 121 (Schull)		
292	C0004	C0007	Letter from Ilaje Eight to CNL Managing Director, dated 5/2/98, re: Position Paper of the Oil Producing Communities in Ilaje Land on the Illegal Activities and Nuisance of the So Called "Concerned Ilaje Citizens"	Omole			
293	C0015	C0015	Chairman/MD's Office Routing List	Omole			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
294	C0009	C0010	Letter from Onyearugbulem to CNL- Managing Director, dated May 7, 1998, re: A Call for Action	Omole	Double hearsay. FRE 802. Dupe of 109 (Haastrup), 473 (Adebawo)		
295	C0016	C0017	Letter from Omole to Akinkuotu, dated May 8, 1998, re: Protest by the Ilaje Citizens of Ondo State	Omole			
296	C0030	C0031	Handwritten letter from Ilaje Eight to The Counsel Manager, Public Affairs Department, dated May 24, 1998, re: Emergency Message: To Tighten or Beef Up Security	Omole			
297	C0020	C0023	Minutes of Meeting Held with the Ilaje Concessional Group at OBE – Sedara Community Held on May 14, 1998	Omole			
298	C0259	C0259	Daily News Report-"Oil companies get quit order in Niger Delta," dated 12/13/98	Omole	Hearsay. FRE 802. Information regarding late 1998 Ijaw crisis and Kaiama Declaration is irrelevant and misleading and also relates to Opia/Ikenyan. FRE 401-403		
299	C19462	C19462	Email from Lorenz to Taylor etc., dated 12/14/98, re: Ijaw Grumbings	Omole	Email dated 12/14/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 596 (MacLeod)		
300	C20106	C20106	E-mail from Lorenz to Omole etc., dated December 15, 1998, re: RE: Call From the Saturday Star of Joburg	Omole	Email is hearsay. FRE 802. Media response regarding 1998 Ijaw crisis is irrelevant and misleading. FRE 401-403. Cumulative of 1560. FRE 401-403		
301	C19458	C19461	E-mail from Lorenz to Sheldon etc., dated 12/15/98, re: FW: News Highlights (Monday, December 14, 1998), REDACTED	Omole	Articles are hearsay. FRE 802. Information regarding late 1998 Ijaw crisis and Kaiama Declaration is irrelevant and misleading and also relates to Opia/Ikenyan. FRE 401-403. Cumulative of other evidence including 260 & 180. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
302	C19128	C19129	E-mail from Lorenz to Sheldon, dated 12/16/98, re: FW: Nigeria Issues	Omole	Email from Sola is hearsay. Mamadou's summary of what Texaco said is hearsay. FRE 802. Information regarding late 1998 Ijaw crisis is irrelevant and misleading. Potential probative value, if any, of email exchange is outweighed by its prejudice. FRE 401-403. Cumulative of other evidence including 263. FRE 401-403		
303	C20382	C20382	E-mail from Connor to Weakley etc., dated December 18, 1998, re: RE: Ijaw ultimatum, dated December 18, 1998	Omole	Email dated 12/18/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 437 (Uwaka), 378 (Neku), 337 (Connor) & 1035 (Mba)		
306	C20438	C20438	E-mail from Kirkland to DJCO etc., dated 12/31/98, re: RHM visit	Omole	Information about the late 1998 Ijaw crisis is Irrelevant and misleading and cumulative of other evidence including 347. FRE 401-403		
307	C20360	C20360	E-mail from Omole to Loo etc., dated 12/31/98, re: FW: Two Expats Kidnapped by Ijaws	Omole	Email string dated 12/31/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
313	C20499	C20500	E-mail from Omole to Irwin etc., dated 1/5/99 re: RE: Two Expats Kidnapped by Ijaws, REDACTED	Omole	Email string dated 1/5/99 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
315	C20271	C20274	E-mail from Golon to Irwin etc., dated 1/5/99, re: Nigeria - Confidential	Omole	Information regarding fall 1998 ethnic crisis is irrelevant and misleading. FRE 401-403. Email from Omole and attachment are hearsay. FRE 802. Cumulative of other evidence including 1740. FRE 401-403		
316	C20381	C20381	E-mail from Connor to NIGEC Operations Manager etc., dated 1/6/99, re: Helicopter Operations, REDACTED	Omole	January 1999 email re: helicopters and weapons is irrelevant, unduly prejudicial and an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
319	C0442	C0444	Fax from Matzke to Derr, dated 1/20/99, re: Niger Delta Situation & Chevron Update, REDACTED	Omole	Information regarding late 1998 Ijaw unrest is irrelevant and misleading. Reference to Opia/Ikenyan is prejudicial and irrelevant. Plaintiffs may not mention Opia/Ikenyan absent responding to discovery into why those plaintiffs dismissed their claims. FRE 401-403. Cumulative of other evidence including 140. FRE 401-403		
321	C19593	C19594	E-mail from Lorenz to Haastrup etc., dated 1/28/99, re: Amnesty Int'l Fax, REDACTED	Omole	Any probative value of Amnesty International inquiry is far outweighed by its prejudice. Questions solely concern Opia/Ikenyan. Cumulative of other evidence. FRE 401-403. Amnesty questions are hearsay. FRE 802		
323	C19345	C19348	E-mail from Lorenz to Irwin etc., dated 2/18/99, re: FW: Issues Document Re Meeting with Representatives	Omole	The prejudice of the HRW report far exceeds its probative value, if any. The report relates to Opia/Ikenyan and is therefore inadmissible. FRE 401-403. Attachment and email from Sola are hearsay. FRE 802. To the extent there is any information about Parabe it is cumulative of other evidence. FRE 401-403		
324	C19225	C19225	E-mail from Lorenz to Haastrup, dated February 23, 1999, re: Parabe Statement, REDACTED	Omole	The prejudice of the HRW report far exceeds its probative value, if any. The report relates to Opia/Ikenyan and is therefore inadmissible. FRE 401-403. To the extent there is any information about Parabe it is cumulative of other evidence. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
325	C20399	C20400	E-mail string re: Kucinich letter, dated February 24, 1999-February 25, 1999, REDACTED	Omole	Recount of meeting with Kucinich and statements made by Kucinich are hearsay as is Omole email. FRE 802. Evidence concerning congressional investigation and HRW report is highly prejudicial that outweighs any possible probative value. The investigation and report were only conducted after Opia/Ikenyan and there are many impermissible references to Opia/Ikenyan making the document misleading. Cumulative of other evidence including 1751. FRE 401-403		
326	C19029	C19030	E-mail from Lorenz to Irwin, dated February 26, 1999, re: RE: Parabe Incident Alignment, REDACTED	Omole	Impermissible reference to Opia/Ikenyan that is prejudicial and misleading. Cumulative of other evidence. FRE 401-403		
327	C0422	C0425	Fax from Irwin to Kirkland etc., dated March 5, 1999, re: Kucinich Activity, with attached letter from Kucinich to Gilman urging investigation into Parabe, REDACTED	Omole	Cumulative of other evidence. FRE 401-403. Evidence concerning congressional investigation and HRW report is highly prejudicial that outweighs any possible probative value. The investigation and report were only conducted after Opia/Ikenyan and there are many impermissible references to Opia/Ikenyan making the document misleading. Cumulative of other evidence including 325. FRE 401-403. Letter is hearsay. FRE 802		
328	C2893	C2897	Letter from Kirkland to Congressman Gilman, dated March 13, 1999, re: "Parabe Incident [REDACTED]"	Omole	Evidence relating to the congressional investigation is prejudicial and misleading. The investigation was done in reaction to Opia/Ikenyan. To the extent there is information about Parabe it is cumulative of other evidence. FRE 401-403. Statements about the content of Kucinich's letter and the investigation are hearsay. FRE 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
329	C0229	C0230	Daily News Report, Newspaper: The Punch, dated 4/3/99, re: "Niger Delta: Chevron refutes rights abuse charges," REDACTED	Omole	Article is hearsay. FRE 802. Impermissible references to Opia/Ikenyan that are prejudicial and misleading. The prejudice of the HRW report far exceeds its probative value, if any. To the extent the article contains information about Parabe it is cumulative of other evidence. FRE 401-403		
330	C20373	C20373	E-mail from Omole to Kirkland etc., dated 6/22/98, re: June 19, 1998 (response to Bronwen Manby on HRW report)	Omole	Email from Omole is hearsay. FRE 802. Incomplete document and fact of HRW inquiry is prejudicial and misleading. FRE 401-403		
331	C19037	C19037	E-mail from Lorenz to Omole etc., dated 10/7/98, re: FW: Democracy Now transcript	Omole	Cumulative of other evidence. FRE 401-403. Summary of what transcript says is hearsay. FRE 401-403. Incomplete document. FRE 106		
332	C0390	C0394	Letter from Matzke to Derr, dated October 19, 1998, re: "Chevron Nigeria Limited (CNL) - Parabe Incident and Current African Issues"	Omole	Summary of statements by Mike Libbey is hearsay. FRE 802. Attachment regarding Ijaw unrest is irrelevant and misleading. Document is internal to Chevron so irrelevant. Cumulative of other evidence including 1517. FRE 401-403		
333	C19053	C19057	E-mail from Lorenz to Taylor etc., dated 10/21/98, re: RE: Security Posture- CNL	Omole			
334	C19109	C19109	E-mail from Lorenz to Omole etc., dated November 30, 1998, re: FW: RE: San Francisco Chronicle, Chevron Responds	Omole	Cumulative of other evidence including 1532. FRE 401-403		
335	C20321	C20323	E-mails from Connor to Haastrup etc., dated 10/27/98, re: Incident last night - Community Situation	Connor	Email string dated 10/27/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 515 (Mba)		
336	C20324	C20330	E-mail from Haastrup to Sheldon etc, dated 11/12/98, re: RE: Update - Community Situation	Connor	Email string dated 11/12/98 unrelated to Parabe is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
337	C20382	C20382	E-mail from Connor to Weakley etc., dated December 18, 1998, re: RE: Ijaw ultimatum	Connor	Email dated 12/18/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 437 (Uwaka), 303 (Omole), 378 (Neku) & 1035 (Mba)		
344	C17819	C17824	ChevronTexaco Drilling Activity Report, dated December 29, 1998-January 2, 1999	Connor	Drilling reports dated 12/98-1/99 unrelated to Parabe are irrelevant, waste of time and prejudicial. FRE 401-403.		
345	C20431	C20431	E-mail from Connor to Dunning, dated December 30, 1998, re: RE: Flowstations	Connor	Email string dated 12/30/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 1044 (Mba), 380 (Neku)		
347	C20438	C20438	E-mail from Kirkland to DJCO etc, dated 12/31/98, re: RHM visit	Connor	Information about the late 1998 Ijaw crisis is irrelevant and misleading and cumulative of other evidence including 306. FRE 401-403		
356	C20381	C20381	E-mail from Connor to NIGEC Operations Manager etc., dated 1/6/99, re: Helicopter Operations, REDACTED	Connor	January 1999 email re: helicopters and weapons is irrelevant, unduly prejudicial and an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		
357	C20436	C20437	E-mail from Connor to Kirkland etc., dated 1/5/99, re: RE: New Operating Conditions	Connor	Email string dated 1/5/99 unrelated to Parabe incident is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability; hearsay. FRE 401-403, 407, 802.		
359	C20419	C20419	E-mail from NIGEC Logistics Supt to Connor etc., dated 1/8/99, re: FW: Security Review - Operations input	Connor	Email string dated Jan. 1999 unrelated to Parabe is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability; hearsay. FRE 401-403, 407, 802. Dupe of 455 (Uwaka)		
360	C20406	C20407	E-mail from Schull to Connor etc., dated 1/15/99, re: RE: Security Review and Planning - Protection of CNL People and Facilities	Connor	Email string dated Jan. 1999 unrelated to Parabe incident is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability; hearsay. FRE 401-403, 407, 802. Dupe of 456 (Uwaka)		
361	C20424	C20426	E-mail from Connor to Uwaka etc., dated 3/8/99, re: FW: Warri Security Review	Connor	Email dated 3/8/99 unrelated to Parabe incident is irrelevant, waste of time and prejudicial; review forwarded is hearsay. FRE 401-403, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
362	C0083	C0083	E-mail from Omole to Kirkland etc., dated 7/2/98, re: Akure-Parabe	Connor	FRE 401, 403, 408, 409, 802		
					Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		
363	C20354	C20355	E-mail from Brown to Connor etc., dated 6/18/98, re: FW: FCPA Clearance	Connor			
364	C21100	C21099	Military Payments for the time period March-December 1998	Neku	Payments dated Aug. 1998 and after, unrelated to Parabe incident, are irrelevant, waste of time. FRE 401-403.		
364	C2994	C3010.23	U.S. \$ Employees in Nigeria - 1996	Brown	Payments dated Aug. 1998 and after, unrelated to Parabe incident, are irrelevant, waste of time. FRE 401-403.		
365	C21102	C21102	Request for Cash (Naira), To: Neku, In payment of: Special duty allowances paid to the Nigerian Army	Neku			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
365	C3322	C3344	Expatriate HR Manual, Emergencies-dated 11/2/92 updated 1/12/94	Brown	1994 manual is irrelevant, remote in time, would confuse the jury and is not evidence of specific agency. FRE 401-403.		
366	C20868	C20894	Employee Expense Report, dated approved 4/3/98, with multiple military payment receipts attached	Neku			
366	C1802	C1806	Counsel and Service Agreement between COPI & CNL for Charging C & S Fees and Purchase Fee, date 2/27/87	Brown			
366A	C1802	C1806	Counsel and Service Agreement between COPI & CNL for Charging C & S Fees and Purchase Fee, date 2/27/87	Etikerentse			
367	C20955	C20958	Military payments, dated January 1998	Neku	OPG payments are irrelevant, waste of time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
367	C0614	C0677	Chevron Corporation 1999 Annual Report, "The Energy to Grow"	Brown	Exhibit is duplicative of 367 (Rick Brown). FRE 403. Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. Bowoto, 312 F. Supp. 2d at 1240 (quoting Phoenix Canada Oil Co. v. Texaco, Inc., 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See Sonora Diamond Corp. v. Super. Ct., 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); U.S. v. Bestfoods, 524 U.S. 51, 71-72 (1998); see also Calvert v. Huckins, 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
368	C20911	C20913	Military payments, dated May 1998	Neku			
368	C2126	C2253	Work Requisitions: 1996-1997	Brown	1996 and 1997 work requests are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
369	C1786	C1798	Letter from Kirkland to Geagea dated 11/8/96 re: CIT/CNL/COCNL Cooperation Agreement	Brown	1996 agreement is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
369A	C1786	C1798	Letter from Kirkland to Geagea dated 11/8/96 re: CIT/CNL/COCNL Cooperation Agreement	Etikerentse	1996 agreement is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
369B	C1786	C1798	Letter from Kirkland to Geagea dated 11/8/96 re: CIT/CNL/COCNL Cooperation Agreement	Howard	1996 agreement is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
370	C17094	C17095	Chart showing Intercompany Balances before and after Realignment, dated 7/31/1999	Brown	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
370			Photographs of Parabe Platform/CBL 101 Barge, 2 color photos	Neku			
371	C21798	C21808	Daily Flight Log, dated 5/28/98, re: Company: Paan	Neku			
371	C1858	C1877	Chevron Nigeria Limited Report and Financial Statements dated 12/31/1998, re: profit and loss account for 1998, statement of accounting policies, report of directors	Brown	Duplicative of Exhibits 267 (Mitchell) and 5241. FRE 403. Irrelevant. FRE 401-402.		
372	C2881	C2882	Minutes of Special Meeting of the Executive Committee of Chevron Corp. dated 4/22/99	Brown	1999 Meeting Minutes are irrelevant and too remote in time. FRE 401-403.		
372	C0050	C0053	Report from Neku to Uwaka, dated June 2, 1998, re: Invasion of CBL 101/Parabe Platform	Neku			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
373	C0046	C0048	Letter from Uwaka to Mukakperuo etc., dated 6/4/98, re: Report of Unlawful Trespass, Threat to Lives, Economic Sabotage, Armed Robbery, and Kidnap	Neku	Dupe of 190 (Lorenz), 433 (Uwaka), 59 (Taylor), 20 (Matzke). FRE 802		
375	C0039	C0041	Log of Parabe Situation, dated 5/25/98-5/28/98	Neku			
377	C19130	C19130	E-mail from Lorenz to Sheldon etc., dated Dec. 17, 1998, re: FW: Ijaw unrest	Neku	Email string dated 12/17/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 436 (Uwaka), 597 (MacLeod)		
378	C20382	C20382	Email from Connor to Weakley etc., dated 12/18/98. re: RE: Ijaw ultimatum	Neku	Email dated 12/18/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 437 (Uwaka), 303 (Omole), 337 (Connor) & 1035 (Mba)		
380	C20431	C20431	Email from Connor to Dunning etc., dated 12/30/98, re: RE: Flowstations	Neku	Email string dated 12/30/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 1044 (Mba), 345 (Connor)		
383	C20381	C20381	E-mail from Connor to NIGEC Operations Manager etc., dated 1/6/99, re: Helicopter Operations, REDACTED	Neku	January 1999 email re: helicopters and weapons is irrelevant, unduly prejudicial and an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		
386	C21034	C21038	Employee Expense Report GO-165, dated 11/17/98, with attached Requests for Cash and Payment Vouchers- military payments	Neku	Payments dated 10/98 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
387	C13362	C13365	Security Review Team Report dated 2/11/99, entitled "Security Review of CNL Field Locations."	Neku	Security review dated Feb. 1999 unrelated to Parabe is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407.		
402	C20296	C20301	Email from Lawal to Omotayo etc., dated 7/23/98, re: RE: AMD Managers' Meeting	Connor	July 1998 email re: Ilaje violence is irrelevant and would confuse the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
403	C25193	C25195	Online article, Yahoo! Finance: Rights group prepares to sue Chevron over Nigeria deaths, dated 10/12/98, by Tony McAuley	Connor	Cumulative. FRE 401-403. The newspaper article is inadmissible hearsay not based on personal knowledge. FRE 602, 802. The threat of the lawsuit is a waste of time because the jury already knows there is a lawsuit and it is not probative of any issue in the litigation. FRE 401-403. Statements by Libby are taken out of context and therefore misleading and prejudicial. FRE 401-403		
404	C25174	C25174	Email to Bordelon from Cagle, dated 10/22/98, re: Sensitive Subject	Connor	FRE 401, 403, 802		
405	C25166	C25172	Organization chart, dated October, Chevron Nigeria Limited, Asset Management Department, Reports to Chairman & Managing Director	Connor	December 1998 organization charts are irrelevant and would confuse the jury. FRE 401-403.		
406	C25005	C25006	Email from Cagle to Bordelon dated 10/22/98, re: Sensitive Subject	Connor	FRE 401, 403, 802		
407	C25013	C25023	Photographs taken May 28, 1998 Escravos Heliport	Connor	FRE 401, 403		
408	C25007	C25007	Email from Bordelon to Cagle, dated 10/22/98, re: Sensitive Subject	Connor	FRE 401, 403, 802		
409	C25009	C25009	Email from Cagle to Bordelon dated 10/25/98, re: RE: Bigmacone	Connor	FRE 401, 403, 802		
410	C25008	C25008	Email from Cagle to Bordelon, dated 10/25/98, re: Testing	Connor	FRE 401, 403, 802		
411	C25205	C25205	Email from Cagle to Cagle, dated 10/28/98	Connor	FRE 401, 403, 802		
412	C25135	C25135	Letter from Pryor to Cagle, dated 4/22/99, re: Letter of commendation	Connor	Dupe of 2727 (Pryor) FRE 401, 403, 802		
413	C25165	C25165	Email from Duck to Connor, <no date>, re: Inquiry	Connor	More prejudicial than probative of any relevant fact, confusing. FRE 403.		
414			Deposition transcript, excerpt from the 1/31/03 deposition of David J. Connor (pages 9 to 24)	Connor	Exhibit is improperly designated. Proper procedure was to designate it as part of deposition designations. Irrelevant; confusing to the jury. FRE 401-403.		
415	C26457	C26457	Organization chart entitled, "Security Services Department," dated March 1997	Uwaka			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
416	C22880	C22879	Email from Golon to Simmons etc., dated 2/22/96, re: RE: Call from Africa re: Nigeria, arms for police	Uwaka	Attachments are hearsay and Shell's policy regarding weapons is irrelevant and misleading. FRE 802, 401-403. Proposed response regarding Shell's weapons policy is irrelevant and misleading. There is no evidence to suggest that CNL purchased arms for the Nigerian military as Shell had. The proposed repose by Jan Golon is an internal draft and is not based on personal knowledge and therefore irrelevant. FRE 401-403. Summary of inquiry from Mr. Fleishman is hearsay. FRE 802		
417	C20851	C20857	Request for Cash, two dated 5/18/98 and one on 6/5/98, with attached pay log	Uwaka			
418	C20858	C20864	Military payments, dated June 1998	Uwaka	FRE 401, 403		
419	C20904	C20913	Military payments, dated Jan, Feb, May, 1998	Uwaka	No objection for May; FRE 401, 403 for other months		
420	C21099	C21102	Military payments, dated March, April 1998	Uwaka			
421	C20942	C20950	Military payments, dated April, May 1999	Uwaka	Payments to OPG police, located in Lagos, are irrelevant, waste of time. FRE 401-403.		
422	C21103	C21112	Military payments dated May 31, 1998 - June 25, 1998	Uwaka	Dupe of 1161 (Origbe)		
423	C20932	C20941	Military payments, dated May, June, July 1998	Uwaka	No objection as to May; FRE 401, 403 as to June and July		
424	C21027	C21033	Military payments, dated October 1998	Uwaka	Payments dated Sept.-Oct. 1998 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
425	C21130	C21140	Military payments for the time period Dec. 1998 - Jan. 1999	Uwaka	Payments dated 12/98-01/99 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403. Partial Dupe of 508 (Momoh)		
426	C21167	C21173	Military payments, dated Jan. 1998, Jan. 1999	Uwaka	Payments dated 12/98-01/99 and unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403. Partial dupe of 1055 (Nwokolo)		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
427	C21174	C21182	Military payments, dated Jan. 1999	Uwaka	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
428	C22872	C22874	Email from Davis to Haastrup etc., dated 6/19/01, re: CBL 101 Itsekiri takeover march 1998	Uwaka			
429	C1591	C1592	Chevron Policy Manual, Policy 50, Crisis Management, effective date December 2, 1999	Uwaka	1999 policy is irrelevant. FRE 401-403.		
430	C1682	C1684	Chevron Policy Manual, Policy 570, "Operating - Security: Security of Personnel and Assets"	Uwaka	Dupe of 46 (Taylor)		
431	C0030	C0031	Two-page handwritten memo, dated 24 May 1998	Uwaka			
432	C0050	C0053	Report from Neku to Uwaka, dated June 2, 1998, re: Invasion of CBL 101/Parabe Platform	Uwaka			
433	C0046	C0048	Letter from Uwaka to Mukakperuo etc., dated 6/4/98, re: Report of Unlawful Trespass, Threat to Lives, Economic Sabotage, Armed Robbery, and Kidnap	Uwaka	Dupe of 373 (Neku), 190 (Lorenz), 59 (Taylor), 20 (Matzke) FRE 802		
434	C19932	C19948	Email from Lorenz to Schull, etc., dated 10/13/98 re: Shut-In at Escravos, with email chain	Uwaka	Email correspondence about late-1998 Ijaw crisis is irrelevant, prejudicial and misleading. FRE 401-403. Attached press reports (C19940, C19941-43), summaries of that report, emails from CNL employees and summaries of statements by Military Administrator are hearsay. FRE 802. Email correspondence about the Scenario planning meeting is irrelevant because testimony shows that the meeting was entirely unrelated to Parabe. FRE 401-403. Cumulative of other evidence. FRE 401-403		
435	C17318	C17323	Fax cover sheet, Dec. 23, 1998 to Joe Lorenz, Billy Watkins, Sola Omole, from Irwin, Re: Kaiama Declaration (attached)	Uwaka	Fax dated 12/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 64 (Taylor), 80 (Kirkland), 7 (Cotta) & 1374 (Ribadu)		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
436	C19130	C19130	E-mail from Lorenz to Sheldon etc., dated Dec. 17, 1998, re: FW: Ijaw unrest	Uwaka	Email string dated 12/17/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 597 (MacLeod), 377 (Neku)		
437	C20382	C20382	E-mail from Connor to Weakley and others, re: Ijaw ultimatum, dated December 18, 1998	Uwaka	Email dated 12/18/98 unrelated to Parabe is irrelevant, waste of time. Fre 401-403. Dupe of 378 (Neku), 303 (Omole), 337 (Connor) & 1035 (Mba)		
450	C20381	C20381	E-mail from Connor to NIGEC Operations Manager etc., dated 1/6/99, re: Helicopter Operations, REDACTED	Uwaka	January 1999 email re: helicopters and weapons is irrelevant, unduly prejudicial and an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		
453	C25034	C25039	Letter dated 4/2/98 from Kirkland to The Chief of Naval Staff re: details on oil spill contingency plans and other security arrangements	Uwaka	Dupe of 494 (Momoh)		
454	C20420	C20420	Email dated 1/7/99 from Connor to NIGEC Logistics Supt and others re: FW: Security review-Operations input	Uwaka	Email dated Jan. 7, 1999 unrelated to Parabe is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407.		
455	C20419	C20419	Email dated 1/15/99 from NIGEC Logistics Supt to Connor and others re: FW: Security review-Operations input	Uwaka	Email string dated Jan. 1999 unrelated to Parabe is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability; hearsay. FRE 401-403, 407, 802. Dupe of 359 (Connor)		
456	C20406	C20407	Email dated 1/15/99 from Schull to Connor and others re: Security Review and Planning - Protection of CNL people and facilities	Uwaka	Email string dated Jan. 1999 unrelated to Parabe incident is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability; hearsay. FRE 401-403, 407, 802. Dupe of 360 (Connor)		
457	C13362	C13377	Security Review Team Report dated 2/11/99, entitled "Security Review of CNL Field Locations."	Uwaka	Security review dated Feb. 1999 unrelated to Parabe is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407. Dupe of 1627 (Etikerentse)		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
458	C26456	C26457	Organizational chart, Public Affairs Department - Reports to the Chairman/Managing Directing, and, Security Services Department- Reports to the Chairman & Managing Director	Adebawo			
459	C24032	C24032	Handwritten letter from The Nine Concessional Oil Mineral Producing Communities to Idowu, dated 12/26/96, re: Recommendation of Mr. Bowoto	Adebawo			
460	C24522	C24527	Minutes of meeting held among Ilaje Communities, Santa-Fe Drilling Company & CNL dated January 8 ,1998	Adebawo			
461	C24073	C24074	Letter from Ilaje Eight to Manager of Community Relations, CNL, dated 19th Jan. 1998, re: Skill Acquisition Programme	Adebawo	Hearsay. FRE 802.		
462	C24024	C24027	Letter from Omosowone to General Manager of Public Affairs Dept, CNL, dated 2nd October, 1997, re: Executive of Ilaje Eight United Oil Producing Communities Association	Adebawo	Hearsay; not authenticated. FRE 802, 901.		
463	C24510	C24510	Letter from Prince Mafo Ola John to The General Manager Public Affairs, CNL, dated 12th Feb. 1998, re: Effective Community Leadership Workshop	Adebawo	Confusing, irrelevant, waste of time. FRE 401-403.		
464	C25000-	C25001	Letter from Dublin-Green to Managing Director of CNL, dated February 16, 1998, re: Protest from the Ugborodo Community Development Organisation	Adebawo	Letter re Itsekiri allegations and dated 2/16/98, which is unrelated to Parabe, is irrelevant, waste of time and hearsay. FRE 401-403.		
465	C24028	C24029	Court order, Suite No. HOK/10M/98 Enrollment of Order, dated March 12, 1998	Adebawo	Hearsay; not authenticated. FRE 802, 901.		
466	C24576	C24576	Letter from Oretan to the Public Relations Manager of CNL, dated 2/9/98, re: Disagreement Over the Post of Liaison Officer in 8 United	Adebawo	Hearsay. FRE 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
467	C24532	C24533	Letter dated from Concerned Ilaje Citizens to the Human Resources Manger of CNL, dated 4/7/98, re: Marginalisation of the Ilajes	Adebawo	Hearsay. FRE 802.		
468	C24534	C24538	Chairman/MD's Office Routing List	Adebawo			
469			Handwritten drawing	Adebawo	FRE 901		
470	C24529	C24531	E-mail from Emiko to Mallard Bay #74 Rig etc., dated 4/16/98, re: RE: Globestar's work plans at Ewan and Meren	Adebawo			
471	C24540	C24543	Letter from Ilaje Eight to CNL Managing Director, dated 5/2/98, re: Position Paper of the Oil Producing Communities in Ilaje Land on the Illegal Activities and Nuisance of the So Called "Concerned Ilaje Citizens"	Adebawo			
472	C0016	C0017	Letter from Omole to Akinkuoto, dated 5/8/98, re: Protest by Ilaje Citizens of Ondo State	Adebawo			
473	C0009	C0010	Letter from Onyearugbulem to Kirkland, dated May 7, 1998, re: A Call for Action	Adebawo	Double hearsay. FRE 802. Dupe of 109 (Haastrup), 294 (Omole)		
474	C20304	C20306	E-mail from Omole to Mba, dated 7/14/98, re: RE: Ilaje: Meeting at Akure	Adebawo	Hearsay and offers to compromise or pay expenses cannot be used to show liability. FRE 408-409, 802.		
475	C0088	C0089	E-mail from Haastrup to Omole etc., dated July 24, 1998, re: Ilaje	Adebawo	Hearsay and offers to compromise or pay expenses cannot be used to show liability. FRE 403, 408-409, 802. Dupe of 184 (Davis)		
476	C26743	C26743	Handwritten notes, dated from 5/26/98-5/29/98	Adebawo	Dupe of 1213 (Jakpa) & 1463 (Ogunjobi) FRE 802, 901		
478	C21387	C21397	Military payments, date range from Aug 1999-Sept1999	Osazuwa	Payments dated Aug.-Sept. 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
479	C21009	C21012	Military payments, date range from Sept 1998-Nov 1998	Osazuwa	Payments dated Sept.-Oct. 1998 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
480			Handwritten drawing	Osazuwa	Irrelevant, waste of time. FRE 401-403.		
481			Handwritten drawing	Osazuwa	Irrelevant, waste of time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
487	C28862	C28863	Military payments dated 1/4/99	Osazuwa	Payment dated 1/4/99 related to Opia/Ikenyan incident is irrelevant, waste of time and prejudicial. FRE 401-403.		
491	C20433	C20433	Email from NIGEC Operations Manager to Connor, re: Flowstations, dated December 30, 1998	Momoh	Email string dated 12/30/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 1043 (Mba)		
494	C25034	C25039	Letter from Kirkland to The Chief of Naval Staff dated 4/2/98 re: details on oil spill contingency plans and other security arrangements	Momoh	Dupe of 453 (Uwaka)		
495	C20382	C20382	Email dated 12/18/98 from Connor to Weakley and others re: Ijaw ultimatum	Momoh	Email dated 12/18/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
498	C25666	C25668	Employee Expense Report GO-165 with attachments CONFIDENTIAL	Momoh	Irrelevant, waste of time. FRE 401-403.		
499	C20881	C20894	Military payments for the time period January-March 1998	Momoh			
500	C20868	C20868	Employee Expense Report GO-165 for time period November 1997 to March 1998	Momoh			
501	C21041	C21043	Military payments in the time period March-April 1998	Momoh			
502	C0012	C0014	Letter from Concerned Ilaje Citizens to The Chairman/Managing Director of Chevron Nigeria Limited re: You Have Grossly Cheated Us," including CIC list of negotiation demands dated April 14, 1998	Bowoto			
502	C21066	C21066	Employee Expense Report GO-165 for time period April, June and July 1998	Momoh			
503	C0024	C0025	Letter from Concerned Ilaje Citizens to the Chairman/Managing Director of Chevron Nigeria Limited re: Your disregard for peace moves dated May 18, 1998	Bowoto			
503	C20850	C20850	Chevron Nigeria Limited Naira Imprest Fund Reimbursement, for payments in the time period May-June 1998	Momoh			
504	B00055	B00056	Concerned Ilaje Citizens List of Demands	Bowoto			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
504	C21054	C21062	Military payments for the time period July, April, May and August 1998	Momoh			
505	C0004	C0007	Letter from Ilaje Eight to CNL Managing Director, dated 5/2/98, re: Position Paper of the Oil Producing Communities in Ilaje Land on the Illegal Activities and Nuisance of the So Called "Concerned Ilaje Citizens"	Bowoto			
505	C21022	C21023	Request for Cash for Nigerian Army for Special duty performances in CNL Operations for time period October 1998	Momoh	Payment dated Oct. 1998 unrelated to Parabe incident is irrelevant, waste of time. FRE 401-403.		
506	C0026	C0028	Letter from Ilaje Eight United Oil Producing Communities Association to The Military Administrator of Ondo State re: Position Paper on the Illegality and Nuisance of the Concerned Ilaje Citizens in Oil Politics, dated May 22, 1998	Bowoto			
506	C21024	C21026	Request for Cash for Special duty performed in CNL Operations Area for October 18 - 31, 1998	Momoh	Payment dated Oct. 1998 unrelated to Parabe incident is irrelevant, waste of time. FRE 401-403.		
507	B00687	B00688	Letter from Concerned Ilaje Citizens to The Manager Public Affairs Chevron Nigeria Limited re: Negotiation, dated May 15, 1998	Bowoto			
507	C21113	C21123	Military payments for the time period November to December 1998	Momoh	Payments dated Nov.-Dec. 1998 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
508	B00036	B00036	Letter from The Concerned Ilaje Citizens to The Manager Public Affairs Department Chevron Nigeria Limited re: Notice of Meeting, dated May 9, 1998	Bowoto			
508	C21130	C21142	Military payments for the time period Dec. 1998 - Jan. 1999	Momoh	Payments dated 12/98-01/99 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403. Partial Dupe of 425 (Uwaka)		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
509	C21133	C21139	Military payments for the time period December 19, 1998 - January 2, 1999,	Momoh	Payments dated 12/98-01/99 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403. Dupe of 1169 (Origbe)		
509	C0018	C0019	Letter from Ilaje Eight United Communities to The General Manager Public Affairs Department Chevron Nigeria Limited re: Position Paper of the Recognized Groups/Communities in Chevron Operation Area of Ilaje land - Ondo State dated May 11, '998	Bowoto			
510	C21140	C21146	Military payments for the time period December 27, 1998 - January 9, 1999	Momoh	Payments dated 12/98-01/99 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403. Partial dupe of 1170 (Origbe)		
510	C0020	C0023	Minutes of Meeting Held With The Ilaje Concessional Group At Obe - Sedara Community Held on May 14, 1998	Bowoto			
511	C0120	C0121	Conduct guidelines issued by CNL to GSF entitled, "Government Security Agents Escravos," March 1998	Mba			
511	C0026	C0029	Letter from Ilaje Eight United Oil Communities Association to The Military Administrator of Ondo Tate re: Position Paper on the Illegality and nuisance of the Concerned Ilaje Citizens in Oil Politics, dated May 22, 1998	Bowoto			
512	C0122	C0122	Force Order No. 237, When a police officer may use firearms	Mba	FRE 401, 403, 802, 901		
512	B00041	B00042	Letter from The Concerned Ilaje Citizens to The Commissioner of Police Ondo State Police Command re: Acts Capable of disturbing public peace in the oil producing communities of Ilaje Ugbo Area of Ondo State, dated June 8, 1998	Bowoto			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
513	C0188	C0188	Letter from Haastrup to Idowu re: Opia and Ikenyan Meetings, dated July 15, 1998, re: sit at home jobs	Mba	Letter and handwritten notes relating to Opia/Ikenyan are irrelevant, waste of time and prejudicial. FRE 401-403. Partial dupe of 1312 (Iluwa), 5 (Cotta) & 1374 (Ribadu)		
514	C20766	C20766	Email from Davis to Connor and others re: Situation Report as of 12 noon Oct 13, dated October 13, 1998	Mba	Email dated 10/13/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
515	C20321	C20323	Email from Connor to Haastrup and others re: Incident last night - Community Situation, dated October 27, 1998	Mba	Email string dated 10/27/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 335 (Connor)		
515			Letter dated 10/26/98 from Bowoto to The Personnel Manager re: The Concessional Oil Mineral Producing Communities In Ilajeland and a letter of confirmation for job allocation	Bowoto	Hearsay. FRE 802.		
516	B00735	B00735	Letter from Bowoto to The Chairman of the ACECUM Committee re: Bowoto's injury sustained and non-challant attitude of 9 concessional oil mineral producing communities, dated September 18, 2001	Bowoto	Hearsay. FRE 802.		
517	B00737	B00740	Chevron Inimical Activities in Ilaje Land (A Year after Chevron Genocide on Ilaje People)	Bowoto	Hearsay. FRE 802.		
517	C17919	C17946	COPI Weekly Drilling Report - Distribution List, Week of 12/28/98 - 1/3/99 re: weekly updates and summaries of each drilling location	Weakley	Late 1998-January 1999 drilling report is irrelevant, unduly prejudicial and an attempt to back door Opia and Ikenyan evidence. FRE 401-403. Duplicative of 517 (Weakley).		
518	C20319	C20320	Email from Chow to Fitzmorris and others re: Opuekeba Simulation & Well Plan, dated November 19, 1998	Weakley	November 1998 email re: Opuekeba plan is irrelevant, unduly prejudicial and would confuse the jury. FRE 401-403.		
518	B00812	B00813	Letter from Omole to The Secretary to The State Government Petroleum Resources Unit re: Protest by Ilaje Citizens of Ondo State dated May 8, 1998	Bowoto			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
519	BO-1296	BO-1298	Environmental Rights Action Environmental Testimonies #20 re: Pains of Parabe Massacre Lingers On, dated March 2, 2000	Bowoto	Hearsay. FRE 802.		
519	C20422	C20423	Security-Community Relations Committee meeting 3/12/98	Weakley	Meeting minutes dated Dec. 3, 1998 is irrelevant, waste of time. FRE 401-403. 288 (Omole) and 1034 (Mba)		
524	C17836	C17836	Copy Weekly Drilling Report - Distribution List, Week of 5/26/98 - 6/1/98	Weakley			
525	C20825	C22831	Minutes of Meeting Held With Tsekelewu Community, dated April 3, 1998	Weakley	Minutes of meeting with Ijaw community is irrelevant, waste of time, prejudicial, hearsay and improper lay testimony re environmental issues. FRE 401-403, 701, 802.		
530	C20431	C20431	Email from Connor to Dunning and others re: Flowstations, dated December 30, 1998	Weakley	FRE 401, 403, 802		
535	C25546	C25551	Steve Peace's log	Peace			
538	C13320	C13323	Diary of S.E. Davis, dated 5/20/98-6/3/98	Browne, M.	Dupe of 101 (Davis) FRE 401, 403 as to 5/21-5/23 and 6/1 to 6/3. No objection to remainder		
541			Defendants' Consolidated Response to Plaintiffs' Interrogatories (Phase II)	Browne, M.	Exhibit is improperly designated. Proper procedure was to designate it as part of discovery. Irrelevant; confusing to the jury. FRE 401-403.		
543	C0313	C0318	Declaration of Michael Browne, dated 8/12/99	Browne, M.	FRE 802		
544			Transcript of D. Schools' deposition, dated 12/9/04	Browne, M.			
554	C25159	C25161	Letter from Candis McGowan to Hinman, dated December 8, 1998, re: Jeff Cagle/COPI	Cagle	FRE 401, 403, 802		
555			Color layout of the Production & Pipeline Facilities	Cagle			
556			Layout of the Production & Pipeline Facilities	Cagle			
557			Photo of personnel on boat	Cagle	FRE 401, 403		
559			Executed Settlement Agreement from Duck to Grimsley, dated May 4, 1999	Cagle	FRE 401, 403, 408		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
560	C25206	C25207	Email from Cagle to Cagle, dated 10/25/98	Cagle	FRE 401, 403, 802		
562	C25010	C25010	Email from Cagle dated 10/25/98 re: ...not mentioning anything about my intentions until Im in Alabama...	Cagle	FRE 401, 403, 802		
563			Multiple photos of boat and village, taken from above (with all Exhibit 563 photos placed behind Tab 563)	Cagle	FRE 401, 403		
564	C25027	C25033	Multiple photos of boat near land, taken from above	Cagle	FRE 401, 403		
565			Photograph of boat and workers on dock area	Cagle	FRE 401, 403		
566	C25013	C25023	Photographs taken May 28, 1998 Escravos Heliport Corpse #1 and #2	Cagle	FRE 401, 403		
567			Photograph of barrel	Cagle	FRE 401, 403		
568			Photograph	Cagle	FRE 401, 403		
569			Photograph	Cagle	FRE 401, 403		
570			Photograph of soldiers	Cagle	FRE 401, 403		
571			Photograph of soldiers on boat	Cagle	FRE 401, 403		
572			Photograph	Cagle	FRE 401, 403		
573			Photograph	Cagle	FRE 401, 403		
574	C25178	C25179	Email from NIGEC Matl. Specialist to Cagle, dated 10/15/98 re: Some more smoke	Bordelon	FRE 401, 403, 802		
575	C25175	C25177	Email from Cagle to Cagle, dated 10/26/98, re: FW: News Highlights (Friday, Oct 23)	Bordelon	FRE 401, 403, 802		
590			Business card of Malcolm MacLeod, ChevronTexaco Global Security	Macleod			
591	C24018	C24019	E-mail from Malling to Taylor, dated 6/18/98, re: RE: Rotational Location Premium Review	Macleod	June 1998 email re: location premiums is irrelevant and is not evidence of specific agency. FRE 401-403.		
592	C24022	C24022	E-mail from MacLeod to Flynn etc., dated February 12, 1998, re: Security report re Ghana/Togo/Benin/Nigeria	Macleod	Irrelevant, waste of time. FRE 401-403.		
593	C19115	C19117	E-mail from Lorenz to Macleod etc., dated 1/18/99, re: Security Review and Planning - Protection of CNL People and Facilities	Macleod	Email string dated Jan. 1999 is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
594	C23315	C23316	E-mail from Taylor to Williams etc., dated 4/30/98, re: FW: COPI Political Risk Consultant - Retired Ambassador John Flynn	Macleod	Irrelevant and waste of time. FRE 401-403		
596	C19462	C19462	E-mail from Lorenz to Taylor etc., dated December 14, 1998, re: ljaw Grumblings	Macleod	Email dated 12/14/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 299 (Omole)		
597	C19130	C19130	E-mail from Lorenz to Sheldon etc., dated Dec. 17, 1998, re: FW: ljaw unrest	Macleod	Email string dated 12/17/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 436 (Uwaka), 377 (Neku)		
601	C20381	C20381	E-mail from Connor to NIGEC Operations Manager etc., dated 1/6/99, re: Helicopter Operations, REDACTED	Macleod	Email dated 1/6/99 relating to Opia/Ikenyan is irrelevant, waste of time and prejudicial. FRE 401-403.		
602	C20419	C20420	E-mail from NIGEC Logistics Supt to Connor etc., dated 1/8/99, re: FW Security Review-Operations Input	Macleod	Email string dated Jan. 1999 unrelated to Parabe is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability; hearsay. FRE 401-403, 407, 802. Dupe of 1011 (Pell)		
603	C20443	C20445	E-mail from Macleod to Connor etc., dated 3/19/99, re: Security Review Programme at Escravos	Macleod	Email string dated March 1999 unrelated to Parabe incident is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407.		
712	B00055	B00056	Concerned Ilaje Citizens List of Demands	Aiyenumelo			
720A	B00015	B00015	Position Letter for the Four Recognized Group in Ilaje Local Government Area. Ondo-State., dated 4/7/08, re: Request to Hold a Meeting	Aiyenumelo	Rule 802		
721	B00666	B00667	Letter from the Concerned Ilaje Citizens to The Human Resource Manager, CNL, dated 7th April 1998, re: Marginalisation of the Ilajes	Aiyenumelo	Rule 802		
722	B00646	B00649	Letter from Concerned Ilaje Citizens to Kirkland, dated April 9th, 1998, re: You Have Grossly Cheated Us	Aiyenumelo	Rule 802		
723	B00663	B00665	Letter from Concerned Ilaje Citizens to the Military Administrator, dated April 30, re: We are posed for action	Aiyenumelo	Rule 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
724	B00844	B00845	Letter from Omole to Akinkuoto, dated May 8th, 1998, re: Protest by Ilaje Citizens of Ondo State	Aiyenumelo			
725	B00686	B00686	Letter from Morris to The Five Associations of Oil Producing Communities of Ilaje land, dated May 11 1998, re: Notice of Meeting	Aiyenumelo	FRE 401, 403, 802, 901		
726	C24030	C24031	Letter from Concerned Ilaje Citizens to The Manager Public Affairs, dated May 13 1998, re: Negotiation	Aiyenumelo	Dupe of 1309 (Iluwa). FRE 802		
727	C0030	C0031	Handwritten letter from the Ilaje Eight to Kirkland, dated May 24, 1998, re: Emergency Message: To Tighten or Beef Up Security	Aiyenumelo			
728	C24033	C24033	Letter from the Ilaje Eight to The General Manager of Public Affairs, CNL, dated 26/5/98, re: "we wish to bring to your knowledge..."	Aiyenumelo			
729	C25211	C25211	Photograph of Parabe Platform	Burnham			
729-BB	C25211	C25211	Photograph of Parabe Platform with notes	Burnham			
730	C25211	C25211	Photograph of Parabe Platform	Browne, M.			
730-A	C25211	C25211	Photograph of Parabe Platform	Daniels, J.			
730B	C25211	C25211	Photograph of Parabe Platform	Peace			
730-BB	C25211	C25211	Photograph of Parabe Platform with parts numbered	Burnham			
731	C25214	C25214	Photograph of Parabe Platform	Browne, M.			
731-A	C25214	C25214	Photograph of Parabe Platform	Daniels, J.			
732	MB-016	MB-016	Photograph of crane	Browne, M.			
733	C25213	C25213	Photograph	Browne, M.			
733-A	C25213	C25213	Photograph	Daniels, J.			
733B	C25213	C25213	Photograph of Parabe Platform	Peace			
733-BB	C25213	C25213	Photograph with notes	Burnham			
734-A	C25215	C25215	Photograph of Helipad on platform	Daniels, J.			
734	C25215	C25215	Photograph of Helipad on platform	Browne, M.			
735	B00612	B00612	Photograph of Parabe Platform CBL 101/Barge	Browne, M.			
736			Hand drawn diagram	Browne, M.			
737	C0285	C0285	Demobilisation Report/CBL-101/ May 29, 1998 authored by Mike Browne	Browne, M.	FRE 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
739	MB001	MB015	Daily Log, dated 1/24/98-2/20/99, with attached photo, authored by Mike Browne	Browne, M.	FRE 401, 403 as to 1/24/98 to 3/21/98, 3/26/98 to 5/24/98, 9/1/98 to 2/20/99; no objection to remainder or to photos		
741	C0319	C0323	Declaration, dated 7/28/99, authored by Tim Browne	Browne, T.	FRE 802		
742	C0291	C0291	Letter from T. Browne to CNL Management, dated March 1, 1999, re: May 25 Parabe incident	Browne, T.	FRE 802		
745	JD-001	JD-001	Photograph of men carrying person on stretcher on helipad	Daniels, J.			
750	C0290	C0290	Handwritten statement of Billy Burnham, dated 3/1/99	Burnham	FRE 802		
751	C0287	C0287	From Burnham to CNL Management, dated 3/1/99, re: typewritten statement	Burnham	FRE 802		
752	MB015	MB015	Photograph of men in office	Burnham			
1000	C25619	C25619	Statement to Osazuwa from Aiyenuberu, dated 7/6/98, "Snatching of CNL Survey Boat at Young Town by Ijaws," signed E.O. Aiyenuberu	Idowu	Letter dated 7/6/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1001	C20751	C20752	Email from NIGEC Public Affairs to Connor etc., 10/31/98, re: RE: Negotiation with youths	Idowu	Email string dated 10/31/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1002	C23001	C23003	Email to from Connor to Kirkland etc., dated 11/1/98, re: FW: Urgent Request: 8 Rooms in Park View	Idowu	Email string dated 11/1/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 1030 (Mba)		
1004	C28143	C28144	Letter from Bowoto Community to the General Manager, Public Affairs Department, CNL, dated 5/23/98, re: Community Complaints, with handwritten notes	Idowu	Hearsay, irrelevant, waste of time. FRE 401-403, 802.		
1005	C25166	C25172	Organization chart, CNL Asset Management Department: Reports to Chairman & Managing Director	Pell	December 1998 organization charts are irrelevant and would confuse the jury. FRE 401-403.		
1006	C22081	C22082	Civil Aviation (Air Navigation) Regulations, Part 8 - Operations	Pell	FRE 401, 403, 901		
1007	C25069	C25130	Documents re: CNL's contract with Sea Truck, date range from Oct 1998-Jan 1999	Pell	Seatrucks contract documents from late 1998 through January 1999 are irrelevant, unduly prejudicial and an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1008	C22508	C22516	Report from Rogan to Connor etc., dated 10/7/99, re: Report of Audit Ehem 99523R Chevron Nigeria Limited Walvis Group Contractor Audit	Pell	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		
1009	C35064	C35078	Weekly reports in late 1999 and early 2000, and "handover notes"	Pell	Reports dated 1999 and 2000 unrelated to Parabe are irrelevant, waste of time. FRE 401-403.		
1010	C20440	C20440	Email from Connor to Macleod, dated 1/8/99, re: CNL hostages , REDACTED	Pell	Email dated 1/8/99 unrelated to Parabe is irrelevant, waste of time. FRE 401-403, 407.		
1011	C20419	C20420	Email from NIGEC Logistics Supt to Connor etc., dated 1/8/99, re: FW: FW: Security Review- Operations input	Pell	Email string dated Jan. 1999 unrelated to Parabe is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407. Dupe of 602 (MacLeod)		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1012	C13362	C13392	Security Review Team Report dated 2/11/99, entitled "Security Review of CNL Field Locations."	Pell	Security review dated Feb. 1999 unrelated to Parabe is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407. Dupe of 68 (Taylor)		
1013			Meier's Daily Flight Log dated 1/4/99	Meier	Flight log dated 1/4/99 related to Opia/Ikenyan is irrelevant, waste of time and prejudicial. FRE 401-403.		
1014			Hand drawing	Meier			
1015	C21798	C21808	Daily Flight Logs	Meier			
1016	C25011	C25006	Copy, email dated 11/1/98 from Max Bordelon to D. Kitchin, subject: "checking in," REDACTED	Kitchin	FRE 401, 403, 802		
1017	C25012	C25020	Email from Jeff N. Cagle to (Max) mebo@compuserve.com, cc: Jeff N. Cagle, dated 10/22/1998 re: "Sensitive Subject" CONFIDENTIAL	Kitchin	Partial dupe of 1468 (Ogunjobi) FRE 401, 403, 802		
1017	C29916	C29919	Payment to community member dated April 26, 1999 re: Capsized Canoe	Jakpa	Receipt and email string dated 4/99 are irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802. Dupe of 1359 (Nwogu)		
1018			Declaration of Guy Brokaw	Kitchin	FRE 401, 403, 802		
1019			Declaration of Dave Kitchin	Kitchin	FRE 401, 403, 802		
1019	C19568	C19570	Email from Lorenz to Libbey and others re: Nigeria/Reuters inquiry, dated October 8, 1998	Jakpa	Summaries of statements by Reuters reporter are hearsay. FRE 802. Information about Ijaw unrest is irrelevant and misleading. Information about environment is irrelevant and prejudicial and goes beyond the limits set by the Court's in limine order. To the extent the document contains information about Parabe it is cumulative of other evidence including 1744 & 223 & 1510. FRE 401-403		
1020	C19037	C19052	Email from Lorenz to Omole and others re: Democracy Now transcript, dated October 7, 1998	Jakpa	Entire interview is hearsay. FRE 802. Statements by Sola are irrelevant to plaintiffs' ratification theory because Sola is a CNL employee, not an employee of defendants. FRE 401-403. Cumulative of 1828 & 222 & 5392. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1021	C26772	C26772	Article from The Guardian titled "NNPC, Chevron Lose 304,000 Barrels in Ilaje Protest" dated 5/29/98	Jakpa	Article is hearsay. FRE 802. Prejudice outweighs probative value. FRE 401-403		
1022	C24544	C24545	Olero Creek's Weekly Report by PE Emiko dated 4.13.98	Jakpa			
1023	C29274	C29274	Email from NIGEC Public Affairs Supt to Omole re: Ilaje - relief for Ilaje dated July 29, 1999	Jakpa	Email string dated 7/29/99 unrelated to Parabe incident is irrelevant, waste of time and prejudicial; hearsay. FRE 401-403, 802.		
1024	C29271	C29273	Chevron Nigerian Limited Request for Check dated 9.7.99	Jakpa	1999 relief payment is irrelevant and would cause undue delay. FRE 401-403.		
1025	C31296	C31296	Request for Cash for allowance of Naval personnel on board Lamarclco Osprove for period October 2-9, 1999	Mba	Payment dated Oct. 1999 is irrelevant, waste of time. FRE 401-403.		
1026	C30118	C30118	Request for Cash for allowance of men who performed special duty escort patrol for period of January 22-23, 1999	Mba	Payment dated 1/23/99 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1027	C30009	C30010	Request for Cash for allowance for Nigeria Police for services rendered between December 1998 and January 1999	Mba	Payment dated 1/20/99 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1028	C20764	C20765	Email from NIGEC Operations Manager to Connor re: Operation's Brief, dated October 27, 1998, REDACTED	Mba	Email dated 10/27/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 1154 (Origbe)		
1029	C20760	C20760	Email from NIGEC Operations Manager to Haastrup and others re: Negotiation with youths, dated October 30, 1998	Mba	Email string dated 10/30/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1030	C23001	C23003	Email from Connor to Kirkland and others re: Urgent Request: 8 rooms in park view, dated November 1, 1998	Mba	Email string dated 11/1/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1031	C23004	C23005	Email from Emiko to Assangha and others re: Flight Tickets to Lagos, dated November 3, 1998	Mba	Email string dated Nov. 1998 relating to plane tickets is irrelevant, waste of time. FRE 401-403.		
1034	C20422	C20423	Security-Community Relations Committee meeting, dated December 3, 1998	Mba	Meeting minutes dated Dec. 3, 1998 is irrelevant, waste of time. FRE 401-403. 519 (Weakley) and 288 (Omole)		
1035	C20382	C20382	Email from Connor to Weakley and others re: Ijaw Ultimatum, dated December 18, 1998	Mba	Email dated 12/18/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 437 (Uwaka), 303 (Omole), 337 (Connor) & 378 (Neku)		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1043	C20433	C20433	Email from NIGEC Operations Manager to Connor re: Flowstations, dated October 30, 1998	Mba	Email string dated 12/30/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 491 (Momoh)		
1044	C20431	C20431	Email from Connor to Dunning and others, re: Flowstations, dated December 30, 1998	Mba	Email string dated 12/30/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 380 (Neku), 345 (Connor)		
1045			Chevron Nigeria Request for Cash (Naira) dated 6.25.98	Nwokolo			
1046			Chevron Nigeria Limited naira Imprest Fund Reimbursement for the Period: June 4, 1998	Nwokolo			
1046	C20310	C20312	Email from NIGEC Security Coordinator to Uwaka and others re: DPR/CNL Meeting at Warri, dated June 26, 1998	Mba	Double hearsay. FRE 802.		
1047	C31979	C31979	Chevron Nigeria Monetary Limits on Service Contracts and Delegation of Authority, dated May 15, 1997	Mba	Delegation limits are irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
1048	C21423	C30532	Military Payments dated April 15, 1998 - October 19, 1999	Nwokolo	Payments dated after 8/98 are irrelevant, waste of time. FRE 401-403.		
1049	C20859	C20861	Military payments dated June 25, 1998	Nwokolo			
1050	C20850	C20850	Chevron Nigeria Limited Naira Imprest Fund Reimbursement, for payments in the time period May-June 1998	Nwokolo			
1051	C35484	C35484	Request for Check from Mendes to The General Manager Finance	Nwokolo	Check request dated 11/99 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1052	C35544	C35544	Military payments dated April 28, 1998	Nwokolo			
1053	C30031	C30031	Military payments dated August 7, 1998	Nwokolo	Payment dated 1/8/99 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Partial dupe of 1566 (Lavington)		
1055	C21167	C21171	Military payments dated January 28, 1999 - February 8, 1999	Nwokolo	Payments dated 12/98-Jan. 99 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403. Partial dupe of 426 (Uwaka)		
1060	C29556	C29561	Minutes of Meeting with Obaghoro Community dated March 5, 1996	Emiko	Minutes of meeting are irrelevant, waste of time, prejudicial, hearsay and improper lay testimony re environmental issues. FRE 401-403, 701, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1061	C29623	C29625	Minutes of Meeting Held With Koko Community, dated April 1, 1997	Emiko	Minutes of meeting with Ijaw community is irrelevant, waste of time. FRE 401-403.		
1062	C29626	C29630	Minutes of Meeting Held With Tsekelewu Community, dated April 1, 1997	Emiko	Minutes of meeting with Ijaw community are irrelevant, waste of time, prejudicial, hearsay and improper lay testimony re environmental issues. FRE 401-403, 701, 802. Dupe of 1243 (Jakpa)		
1063	C29676	C29680	Minutes of Meeting Held with Bateren Community, dated March 16, 1997	Emiko	Minutes of meeting with Itsekiri community is irrelevant, waste of time, prejudicial, hearsay and improper lay testimony relating to environmental issues. FRE 401-403, 701, 802.		
1064	C29667	C29670	Minutes of Meeting Held With Deghele Community, dated May 16, 1997	Emiko	Minutes of meeting are irrelevant, waste of time and hearsay. FRE 401-403, 802.		
1065	C29694	C29699	Minutes of Meeting Held With the Sub-Committee on Ugborodo Community Trust, dated June 4, 1997	Emiko	Minutes of meeting with Itsekiri community is irrelevant, waste of time and hearsay. FRE 401-403, 802.		
1066	C29759	C29763	Minutes of Meeting Held With Bateren Community, dated June 29, 1997	Emiko	Minutes of meeting with Itsekiri community is irrelevant, waste of time and hearsay. FRE 401-403, 802.		
1067	C29792	C29795	Minutes of Meeting Held With Tebu Community, July 28, 1997	Emiko	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802. Dupe of 1380 (Ribadu)		
1068	C29797	C29801	Minutes of Meeting Held With Obaghoro Community, dated July 28, 1997	Emiko	Minutes of meeting with Itsekiri community is irrelevant, waste of time and hearsay. FRE 401-403, 802. Partial dupe of 1379 (Ribadu)		
1069	C22854	C22956	Minutes of Quarterly Meeting Held with Kokodiagbene Community at CNL Club Warri on February 10, 1998	Emiko	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		
1070	C22836	C29718	Minutes of Meeting Held with Idama Community, dated March 26, 1998	Emiko	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1071	C22819	C22821	Minutes of Quarterly Meeting held with Tisun Community at Tisun, dated April 24, 1998	Emiko	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		
1073	C0180	C0182	Note from Haastrup to Pee, dated June 16, 1998	Emiko	Handwritten notes dated 6/16/98 related to Opia is irrelevant, waste of time and prejudicial. FRE 401-403.		
1073	C0180	C0182	Note from Omole to AOH, dated June 10, 1998	Emiko	Handwritten notes dated 6/16/98 related to Opia is irrelevant, waste of time and prejudicial. FRE 401-403.		
1074	C0179	C0179	Note from Haastrup to Omole, dated June 15, 1998	Emiko	Handwritten notes dated 6/15/98 related to Opia is irrelevant, waste of time and prejudicial. FRE 401-403; see also Emiko Dep., pp. 316-317. Dupe of 75 (Kirkland)		
1075	C22799	C22801	Minutes of Quarterly Meeting Held with Deghele Community, dated August 20, 1998 - WITHDRAWN	Emiko	Minutes of meeting are irrelevant, waste of time and hearsay. FRE 401-403, 802.		
1076	C23007	C23008	Email from Haastrup to Shadiya and others re: meeting with Ijaws, dated November 4, 1998	Emiko	Email string dated 11/4/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1078	C27541	C27543	Report of Joint Meeting Between CNL, WDN, Opuama and Tsekelewu Communities on 20/11/98. Held at David Ejoor Barrack Warri, dated November 23, 1998 - WITHDRAWN	Emiko	Report of Meeting with Ijaw communities is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		
1080	C31779	C31780	Email from Jakpa to Emiko and others re: Sogholo Women Association, dated February 15, 1999	Emiko	Email string dated Feb. 1999 unrelated to Parabe is irrelevant, waste of time, prejudicial and improper lay testimony on environmental issues. FRE 401-403, 701. Dupe of 1325 (Iluwa), 1360 (Nwogu)		
1084	C22782	C22785	Report of Quarterly Meeting Between Chevron and Omadino Community Held at Nenuwa Hall, Omadino on Friday, March 12, 1999 - WITHDRAWN	Emiko	Minutes of March 1999 meeting with non-Ilaje community is irrelevant, waste of time and hearsay. FRE 401-403, 802. Dupe of 1322 (Iluwa)		
1085	C22780	C22781	Minutes of Quarterly Meeting held with representatives of Bateren Community on May 14, 1999 - WITHDRAWN	Emiko	Minutes of meeting are irrelevant, waste of time and hearsay. FRE 401-403, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1087	C22701	C22704	Minutes of Quarterly Meeting Held With Ureju Community At Chevron Conference Room, Warri on November 11, 2000 - WITHDRAWN	Emiko	Minutes of Nov. 2000 meeting with Itsekiri community is irrelevant, waste of time, prejudicial, hearsay and improper lay testimony on environmental issues. FRE 401-403, 701, 802. Dupe of 1332 (Ilwua)		
1088	C22670	C22672	Minutes of Quarterly Meeting Held With Obaghoro Community At CNL Conference Room, Warri on Wednesday November 23, 2000 - WITHDRAWN	Emiko	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		
1089	C24174	C24175	Letter from Oyetakin and others to The General Manager Public Affairs & Government Chevron Nigeria Ltd and others re: The Agony of Parabe Crisis on the Family of Late Jola Ogungbeje, dated March 10, 2003	Emiko	FRE 401, 403, 408, 409, 802		
1090	C31791	C31805	Agenda with dates ranging from April 29, 1998 - May 26, 1998	Hervey	FRE 401, 403 as to 4/29 to 5/23; no objection to remainder		
1090	C25211	C25211	Black and white photocopy of barge and platform, with Ulori's markings	Ulori			
1091	C17952	C17969	North Offshore Morning Report, dated May 20, 1998 - June 6, 1998	Hervey	Dupe of 5379, 266 (Mitchell) & 168 (Harrison). FRE 401, 403 to 5/20 to 5/24, 6/1 to 6/6; no objection to remainder		
1097			Black and White photo of barge with Ulori's markings	Ulori			
1098			Drawing of a circle and a rectangle made by Ulori	Ulori			
1099			Pay slips received by Ulori when he worked for Globestar	Ulori	FRE 401, 403		
1100	C25211	C25211	Black and White Photograph of barge and platform with notes	Irowaninu, T.			
1110	C25211	C25211	Black and White photo of platform	Boyo			
1150	C35021	C35079	Weekly Report dated 12/27/99 to 2/2/00	Origbe	FRE 401, 403, 802		
1153	C33098	C33098	Letter from Uwaka to The Squadron Commander re: Thanks for service rendered by mobile police, dated September 26, 1998	Origbe	FRE 401, 403, 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1154	C20764	C20765	Email from NIGEC Operations Manager to Connor re: Operation's Brief, dated October 27, 1998, REDACTED	Origbe	Email dated 10/27/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Dupe of 1028 (Mba)		
1155	C25628	C25629	Letter from Origbe to Uwaka re: Incident report: alleged kidnap of ijaws at abiteye dated December 16, 1997	Origbe	Report dated 12/16/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1156	C33070	C33072	Letter from Nwokolo to Uwaka and others re: Payment of Allowances to Naval Men, dated November 3, 1997 and attached military payments for the October 1997 time period	Origbe			
1160	C20904	C20914	Military payments dated April 21, 1998 - June 25, 1998	Origbe			
1161	C21103	C21112	Military payments dated May 31, 1998 - June 25, 1998	Origbe			
1162	C20990	C20992	Military payments dated July 22, 1998 - August 18, 1998	Origbe	Reimbursement for lost personal effects is irrelevant, waste of time. FRE 401-403.		
1163	C30525	C30525	Military payments dated October 8, 1998	Origbe	Payment dated 10/8/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403. Partial dupe of 1474 (Okeleu)		
1164	C30305	C30305	Military payments dated October 16, 1998	Origbe	Payment dated 10/16/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1165	C30304	C30304	Military payments dated October 16, 1998	Origbe	Payment dated 10/16/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1166	C30302	C30302	Military payments dated October 20, 1998	Origbe	Payment dated 10/20/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1167	C21142	C21142	Military payments dated January 9, 1999	Origbe	Payment for duty in Dec. 98-Jan. 99 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1168	C21141	C22146	Military payments dated December 9, 1998 - December 28, 1998	Origbe	Payments for duty in Nov. 1998 unrelated to Parabe incident is irrelevant, waste of time. FRE 401-403.		
1169	C21133	C21139	Military payments for the time period December 19, 1998 - January 2, 1999,	Origbe	Payments dated Dec. 98- Jan 99 and unrelated to Parabe are irrelevant, waste of time. FRE 401-403. Dupe of 509 (Momoh)		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1170	C21140	C21140	Military payments dated December 30, 1998	Origbe	Payment dated 12/30/98 unrelated to Parabe incident is irrelevant, waste of time. FRE 401-403. Partial dupe of 510 (Momoh)		
1171			Military payments dated January 7, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1172	C21268	C21269	Military payments dated January 14, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1173	C30007	C30007	Military payments dated January 18, 1998	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1174	C21271	C21271	Military payments dated January 24, 1999 - February 6, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1175	C30130	C30130	Military payments dated February 11, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1176	C32442	C32442	Military payments dated March 11, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1177	C31654	C31654	Military payments dated March 11, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1178	C31180	C31180	Military payments dated May 10, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1179	C30916	C30916	Military payments dated May 18, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1180	C21263	C21295	Military payments dated January 26, 1999 - June 4, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1181	C29958	C29958	Military payments dated June 8, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1182	C29961	C29961	Military payments dated June 11, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1183	C29960	C29960	Military payments dated June 11, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1184	C29959	C29959	Military payments dated June 11, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1185	C21292	C21292	Military payments dated June 23, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1186	C21329	C21330	Military payments dated June 15, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1187	C30833	C30833	Military payments dated June 15, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1188	C30835	C30835	Military payments dated June 15, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1189	C30837	C30837	Military payments dated June 16, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1190	C30540	C30540	Military payments dated June 30, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1191	C30541	C30541	Military payments dated June 30, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1192	C30538	C30538	Military payments dated June 30, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1193	C30544	C30544	Military payments dated July 3, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1194	C30542	C30542	Military payments dated July 3, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1195	C30547	C30547	Military payments dated July 6, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1196	C30549	C30549	Military payments dated July 6, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1197	C30550	C30550	Military payments dated July 7, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1198	C30552	C30552	Military payments dated July 8, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1199	C30561	C30561	Military payments dated July 11, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1200	C30562	C30562	Military payments dated July 11, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1201	C30734	C30734	Military Payment dated July 18, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1201	C22083	C22087	Aeroplane Operations Manual Pan African Airlines (Nigeria) Limited	Glasby	Partial dupe of 1466 (Ogunjobi) FRE 401, 403		
1202	C30735	C30735	Military Payment dated July 18, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1203	C30736	C30736	Military Payment dated July 19, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1204	C30738	C30738	Military Payment dated July 19, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1205	C30739	C30739	Military Payment dated July 20, 1999	Origbe	Irrelevant, waste of time. FRE 401-403.		
1206	C30011	C30012	Military Payments dated July 24, 1999	Origbe	Payment dated 7/24/99 unrelated to Parabe incident is irrelevant, waste of time. FRE 401-403.		
1207	C30017	C30017	Military Payments dated July 29, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1208	C30018	C30018	Military Payments dated July 29, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1209	C30019	C30019	Military Payment dated July 31, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1210	C30545	C30545	Military Payment dated July 6, 1999	Origbe	Payments dated 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1211	C33066	C33066	Military Payment dated October 31, 2000	Origbe	Payment dated Oct. 2000 unrelated to Parabe incident is irrelevant, waste of time. FRE 401-403.		
1212	C20365	C20372	Email from Haastrup to Udoma, etc., dated June 23, 1998, re: latest edition of our Parabe response	Jakpa	Irrelevant and misleading because attachment is internal draft. FRE 401-403. Letter has multiple levels of hearsay. FRE 802		
1213	C26743	C26743	Note re: Email to Olero	Jakpa			
1214	C24036	C24037	Letter from Omole to the Concerned Ilaje Citizens and others re: Act Now Or... , dated July 23, 1998	Jakpa	FRE 401, 403, 408, 802		
1215	C0918	C0919	Email from Omole to Schull and others re: Ilaje, dated July 24, 1998	Jakpa	FRE 401, 403, 408, 409, 802		
1216	C20307	C20309	Email from Omole to Haastrup and others re: meeting at Ugbo, dated July 1, 1998	Jakpa	Offers to compromise or pay expenses cannot be used to show liability; hearsay, prejudicial. FRE 403, 408-409, 802.		
1217	C20825	C22831	Minutes of Meeting Held With Tsekelewu Community	Jakpa	Minutes of meeting with non-Ilaje communities are irrelevant, waste of time, prejudicial, hearsay and improper lay testimony re environmental issues. FRE 401-403, 701, 802.		
1218	C30340	C30341	Email from Jakpa to Emegere and others re: Adagbarassa/Ashantuagbene dated October 9, 1998	Jakpa	October 1998 meeting expenses with unrelated communities and speculative comments are irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403, 602, 802.		
1219	C25216	C25216	Map of Escravos area	Jakpa			
1226	C29562	C29568	Minutes of Meeting with Benin River Communities	Jakpa	Minutes of meeting with Ijaw communities is irrelevant, waste of time and prejudicial. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1227	C35778	C35786	Acquisition of Dibi G Oil Location re: Payment of Compensation to Ureju Community	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1228	C35721	C35721	Letter from Hagstrom to Jakpa re: Land Acquisition for Dibi flowstation and Access Canal to Gbokoda G, dated January 1, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1229	C35720	C35720	Letter from Omole to The Chairman Warri North Local Government Area re: Land Acquisition for Dibi Flowstations and Access Canal to Gbokoda	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1230	C35773	C35777	Payments to community dated January 17, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1231	C35714	C35714	Letter from Emegere to Jakpa re: Ownership of Land Required for Benin River Flowstation and its Access Canal	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1232	C35681	C35683	This Power of Attorney, dated January 22, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1233	C35703	C35712	Okotie and Company Valuation Report on the Various Interests of Tisun Community, et cetera, February 3, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1234			Acquisition of Land for Dibi Flow Station, Flare Site and Access Canal to Gbokoda G Location, dated February 4, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1235	C35768	C35772	Letter from Udoma to Edun & Co and others re: Alleged Sinking of Drilling Pipes at Emughele Village dated April 8, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1236	C35684	C35702	Letter from Okotie to Jakpa re: Acquisition of A 92.072 HA. Land for Dibi flowstation, flare site and access canal to good "g" location	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1237	C35318	C35320	Letter from Jakpa to Omole re: Acquisition of Land for Dibi Flowstation, Flare Site and Access Canal to Gbokoda 'G' Location, dated January 14, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1238			CNL Union Bank Check to Okotie and Company for 58,521,775 Naira	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1239	C35715	C35719	Letter from Omole to Fred Enemigin & Associates re: Acquisition of Land for the Construction of Idibi Flowstation, dated February 28, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1240	C35671	C35673	This Power of Attorney, dated February 28, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1241	C35696	C35696	Request for Check from Schull to The General Manager Finance	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1242	C35653	C35655	Chevron Nigeria Limited Compensation Receipt and Indemnity	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1243	C29626	C29630	Minutes of Meeting Held with Tsekelewu Community	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1244	C35329	C35333	Chevron Nigeria Limited Compensation Receipt and Indemnity, dated April 18, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1245	C35315	C35317	Chevron Nigeria Limited Compensation Receipt and Indemnity, dated April 30, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1246	C35334	C35339	Chevron Nigeria Limited Compensation Receipt and Indemnity, dated May 12, 1997	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1247	C35732	C35736	Valuation Report on Acquisition of Flow line route from Dibi 'G' to Robins Creek at Ureju Community Warri North Local Government Area Delta State	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1248	C35737	C35741	Valuation Report on Acquisition of Flow line route from Robins Creek to Dibi 'D&F' and to RMP 15 at Tisun and Ureju Communities Warri North Local Government Area Delta State	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1249	C35751	C35753	Acquisition of Land for Flowline Right of Way From DIBI 6 (G) to REMP 245 (J30) Flowline	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1250	C35631	C35633	Acquisition of Land For DIBI "L" Location	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1251	C35616	C35619	Valuation Report on Various Interests of Tisun Community Likely to be Adversely Affected by the Acquisition of a 2.639 Ha. Parcel of Tisun land required by Chevron Nigeria Limited for the proposed DIBI Flowstation Water source Cluster Location	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1252	C35298	C35307	Chevron Nigeria Limited Compensation Receipt and Indemnity	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1253	C35620	C35621	Acquisition of Additional Land for Water Source Cluster and Flare Extension	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1254	C35639	C35642	Chevron Nigeria Limited Request for Check dated October 7, 1998	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1255	C35755	C35759	Chevron Nigeria Limited Request for Check dated October 20, 1998	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1256	C35756	C35756	Chevron Nigeria Limited Union Bank Receipt	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1257	C35308	C35314	Chevron Nigeria Limited Compensation Receipt and Indemnity, dated November 11, 1998	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1258	C29656	C29662	Letter from Nwogu to Mojuetan re: Compensation for temporary acquisition of additional land, contracts	Jakpa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1259	C31078	C31079	Email from NIGEC Olero Creek PA to Emegere and others re: Capsized canoe, dated May 6, 1999	Jakpa	Email string dated May 1999 unrelated to Parabe is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802. Dupe of 1358 (Nwogu)		
1260	C30369	C30369	Payments to community dated July 4, 1999	Jakpa	Irrelevant, waste of time. FRE 401-403.		
1261	C30371	C30371	Payments to community dated July 4, 1999	Jakpa	Community payment dated 7/6/99 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1262	C29599	C29600	Letter from Ejuwa to The General Manager Public Affairs Department re: Reminder Letter, Over Non-Payment of Compensation On Ewan Oil Spillage 26/7/98 dated January 1999	Jakpa	Letter relating to oil spill occurring after Parabe incident is irrelevant, waste of time and prejudicial; hearsay. FRE 401-403, 802; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
1263	C0903	C0908	Handwritten and typed letters regarding payment for injuries sustained by Larry Bowoto dated 6/29/21998-8/31/1998	Ajani	FRE 401, 403, 408, 409, 802, 901		
1264	B00615	B00615	Photo of Larry Bowoto	Ajani	FRE 401, 403		
1265	B00616	B00616	Close-up Photo of Larry Bowoto	Ajani	FRE 401, 403		
1266	B00617	B00617	Side view Photo of Larry Bowoto	Ajani	FRE 401, 403		
1267	B00619	B00619	Side view close-up of Larry Bowoto	Ajani	FRE 401, 403		
1268	B00628	B00628	Side view close-up of Larry Bowoto	Ajani	FRE 401, 403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1272	C25216	C25216	Map of portion of Nigeria	Okowi			
1273			Diagram of Escravos Compound Drawn by Charles Adeniji	Adeniji			
1274			Diagram of Awoye Community drawn by Philemon Ebiesuwa	Ebiesuwa	Drawing attributing certain environmental issues to Chevron Nigeria Ltd. is improper lay testimony, hearsay and irrelevant and prejudicial. FRE 401-403, 701, 802; see also Order Defs.' Mot. in Limine re Environ. Dkt. 1210.		
1275			Diagram of Awoye Community drawn by Philemon Ebiesuwa	Ebiesuwa	Drawing attributing certain environmental issues to Chevron Nigeria Ltd. is improper lay testimony, hearsay and irrelevant and prejudicial. FRE 401-403, 701, 802; see also Order Defs.' Mot. in Limine re Environ. Dkt. 1210.		
1276	B00689	B00690	Letter from Concerned Ilaje Citizens to the Manager Public Affairs, Chevron (Nig) Ltd., dated May 13, 1998 re: Negotiations	Ebiesuwa	FRE 802		
1277	B00691	B00692	Letter from Concerned Ilaje Citizens to the Chairman/Managing Director, Chevron Nigeria Limited, dated May 18, 1998 re: Your Disregard for Peace Moves	Ebiesuwa	FRE 802		
1278	B0818	B0821	Letter from Ilaje Eight to Military Administrator of Ondo State, Navy Commander Anthony Ibe Onyearugbulem, dated May 22, 1998 Re: Position Paper on the Illegality and Nuisance of the Concerned Ilaje Citizens in Oil Politics	Ebiesuwa			
1279	B00714	B00715	Letter from Concerned Ilaje Citizens to the Managing Director of Globestar Engineering Company Nig. Ltd., dated July 20, 1998 Re: Illegal Negotiations by Some Ilaje Representatives	Ebiesuwa	FRE 401, 403, 802		
1280	B0737	B0740	Document entitled "Chevron Inimical Activities in Ilaje Land (A Year after Chevron Genocide on Ilaje People)"	Ebiesuwa	FRE 401, 403, 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1281	C29506	C29509	Report of Meeting Between Chevron and Nine Concessional Oil Mineral Producing Communities of Ilaje held at Obe-Uji on November 19, 1996	Arenewo			
1282	C28333	C28339	Report of Meeting Among Ilaje Communities Santa-Fe Drilling Company and CNL held at Warri on December 9, 1997	Arenewo			
1283	C0020	C0023	Minutes of Meeting Held with the Ilaje Concessional Group at OBE – Sedara Community Held on May 14, 1998	Arenewo			
1289	C25019	C25019	Photograph of Arolika Irowarinun	Irowarinun, Margaret	FRE 401, 403		
1297			Letter from Onyearugbulem to Kirkland, dated May 7, 1998, re: A Call for Action	Iluwa	FRE 802		
1298			The Marginalisation of the Ilajes of Ondo State by Companies Prospecting for and Exploiting Crude Oil in the Area: A Case Study of CNL, dated 5/5/98	Iluwa	FRE 401, 403, 802		
1301	C27544	C27553	Email from Eldridge to Bates etc., dated 11/19/98, re: FW: Opuekeba Proposed Well Locations	Iluwa	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1302	B00844	B00845	Letter from Omole to Akinkuoto, dated, 5/8/98, re: Protest by Ilaje Citizens of Ondo State	Iluwa			
1303	C0024	C0025	Letter from Concerned Ilaje Citizens to Kirkland etc., dated 5/18/98, re: Your Disregard for Peace Moves	Iluwa	FRE 802		
1305	C0004	C0007	Letter from Ilaje Eight to CNL Managing Director, dated 5/2/98, re: Position Paper of the Oil Producing Communities in Ilaje Land on the Illegal Activities and Nuisance of the So Called "Concerned Ilaje Citizens"	Iluwa			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1306	C28383	C28383	Email from NIGEC Public Affairs Supt to Omole, dated July 29, 1999, re: FW: Ilaje Relief for Ilaje	Iluwa	Email and handwritten notes dated July-Aug. 1999 unrelated to Parabe incident is irrelevant, waste of time and prejudicial. FRE 401-403.		
1307	C29034	C29034	Chevron Nigeria Limited Request for Check, payable to Haastrup originated by Iluwa, dated 11/19/99	Iluwa	Irrelevant, waste of time, confusing. FRE 401-403.		
1308	C30682	C30682	Chevron Nigeria Limited Request for Check, payable to Alasiri originated by Iluwa, dated 4/8/99	Iluwa	Irrelevant, waste of time, confusing. FRE 401-403.		
1309	C24030	C24031	Letter from the Concerned Ilaje Citizens to Kirkland etc., dated 5/13/98, re: Negotiation	Iluwa	Dupe of 726 (Aiyenumelo). FRE 802		
1310			Letter from The Concerned Ilaje Citizens to the Human resources Representative etc., dated 4/22/98, re: Marginalisation of the Ilajes and Request for Appointment	Iluwa	FRE 802		
1311	C35787	C35788	Public Affairs Update, 7/13/98, with handwritten notes	Iluwa	Report related to Opia/Ikenyan is irrelevant, waste of time and prejudicial. FRE 401-403.		
1312	C0188	C0198	Letter from Haastrup to Idowu re: Opia and Ikenyan Meetings, dated July 15, 1998, re: sit at home jobs	Iluwa	Letter and handwritten notes relating to Opia/Ikenyan are irrelevant, waste of time and prejudicial. FRE 401-403. Partial dupe of 513 (Mba), 5 (Cotta) & 1374 (Ribadu)		
1313	C30670	C30671	Chevron Nigeria Limited Request for Check, payable to Alasiri originated by Iluwa, dated 4/22/99	Iluwa	FRE 401, 403		
1314	C29367	C29367	Chevron Nigeria Limited Request for Check, payable to Warri Old Peoples Home originated by Iluwa, dated 11/18/99	Iluwa	FRE 401, 403		
1315	C29366	C29366	Chevron Nigeria Limited Request for Check, payable to St. Ann's Orphanage originated by Iluwa, dated 11/18/99	Iluwa	FRE 401, 403		
1316	C29363	C29363	Chevron Nigeria Limited Request for Check, payable to Iluwa originated by Iluwa, dated 11/24/99	Iluwa	FRE 401, 403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1317	C29362	C29362	Chevron Nigeria Limited Request for Check, payable to Iluwa originated by Iluwa, dated 11/24/99	Iluwa	FRE 401, 403		
1318	C25053	C25057	1998 Community Relations Work Programme	Iluwa			
1319	C29563	C29568	Minutes of Meeting Between Chevron and Benin River Communities on Wednesday, January 31, 1996	Iluwa	Minutes of meeting with Ijaw communities is irrelevant, waste of time and prejudicial. FRE 401-403.		
1321	C29547	C9549	Report of Site Walk Conducted by Chevron and Ugborodo Community on June 25 as a follow-up to the Meeting with the Community on April 19, 1996	Iluwa	Site walk with Itsekiri community is irrelevant, waste of time and hearsay. FRE 401-403, 802.		
1322	C22782	C22785	Report of Quarterly Meeting Between Chevron and Omadino Community Held at Nenuwa Hall, Omadino on Friday, March 12, 1999 - WITHDRAWN	Iluwa	Minutes of March 1999 meeting with non-Ilaje community is irrelevant, waste of time and hearsay. FRE 401-403, 802. Dupe of 1084 (Emiko)		
1324	C35360	C35361	Email from NIGEC Public Affairs Supt to Iluwa etc., dated 12/8/99, re: RE: Key Bermuda- November Salaries for Four Ilaje Workers	Iluwa	Email string dated 12/99 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
1325	C31779	C31780	Email from Jakpa to Emiko etc., dated 2/15/99, re: RE: Sogholo Women Association	Iluwa	Email string dated Feb. 1999 unrelated to Parabe is irrelevant, waste of time, prejudicial and improper lay testimony on environmental issues. FRE 401-403, 701. Dupe of 1080 (Emiko), 1360 (Nwogu)		
1327	C23364	C23366	Email from NIGEC Public Affairs Supt to Olukanni etc., dated 7/22/99, re: RE: Ilaje	Iluwa	Email string dated July 1999 unrelated to Parabe incident is irrelevant, waste of time and prejudicial. FRE 401-403.		
1331	C20716	C20718	Email from Assangha to Connor, dated 3/15/99, re: FW: Report of Security Meeting at P.T.I. Conference Center	Iluwa	Email string dated 3/99 unrelated to Parabe incident is irrelevant, waste of time and hearsay. FRE 401-403, 802.		
1332	C22701	C22704	Minutes of Quarterly Meeting Held with Ureju Community at CNL Conference Room, Warri, on November 11, 2000 - WITHDRAWN	Iluwa	Minutes of Nov. 2000 meeting with Itsekiri community is irrelevant, waste of time, prejudicial, hearsay and improper lay testimony on environmental issues. FRE 401-403, 701, 802. Dupe of 1087 (Emiko)		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1333	C22725	C22726	Minutes of Quarterly Meeting with Koko Community on April 27, 2000 - WITHDRAWN	Iluwa	Minutes of April 2000 meeting with non-Ilaje community is irrelevant, waste of time. FRE 401-403.		
1334	C22731	C22732	Minutes of Quarterly Meeting Held with Bateren Community at CNL Conference Room, Warri, on Thursday, April 20th, 2000 - WITHDRAWN	Iluwa	Minutes of April 2000 meeting with non-Ilaje community is irrelevant, waste of time. FRE 401-403.		
1335	C22738	C22739	Minutes of Quarterly Meeting Held with Ebrohimi Community at CNL Conference Room, Warri, on Wednesday, April 19th, 2000 - WITHDRAWN	Iluwa	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		
1336	C22735	C22737	Minutes of Quarterly Meeting with Tisun Community Held at CNL Conference Room, Warri, on April 19th, 2000 - WITHDRAWN	Iluwa	Minutes of meeting with Ijaw community is irrelevant, waste of time, prejudicial, hearsay and improper lay testimony re environmental issues. FRE 401-403, 701, 802.		
1337	C22733	C22734	Minutes of Quarterly Meeting Held with Deghele Community at CNL Conference Room, Warri, on Thursday, April 20th, 2000 - WITHDRAWN	Iluwa	Minutes of meeting are irrelevant, waste of time and hearsay. FRE 401-403, 802.		
1338	C35712	C35712	Letter from Emegere to Jakpa, dated 1/21/97, re: Ownership of Land Required for Benin River Flowstation and its Access Canal	Nwogu	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1339	C35683	C35700	Okotie and Company Valuation Report 29 on the Various Interests of Tisun Community, et cetera, dated 2/3/97	Nwogu	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1340	C35701	C35710	Okotie and Company Valuation Report 29 on the Various Interests of Kolokolo and Tisun Communities, et cetera, 2/3/97	Nwogu	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1342	C0913	C0915	Email from Omole to Connor etc., dated 12/18/98, re: RE: Ijaw Declaration	Nwogu	FRE 401, 403, 802		
1343	C29631	C29632	Minutes, Meeting with Odofado Community RE: Well 7 to Platform ROW Acquisition and Payment, dated 11/25/96	Nwogu	Irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1344	C35673	C35677	Acquisition of Land for Dibi Flowstation, Flare Site and Access Canal to Gbokoda G Location, dated 2/4/97	Nwogu	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1345	C22850	C22853	Minutes of the Quarterly Meeting Between CNL and Kokodiagbene Community Held at Kokodiagbene on March 5, 1998	Nwogu	Minutes of meeting with Ijaw community is irrelevant, waste of time, prejudicial, hearsay and improper lay testimony re environmental issues. FRE 401-403, 701, 802.		
1346	C29130	C29130	Letter from Omole to Schull, dated 3/9/99, re: Abiteye JKT 6 Spills of March 3, 1999	Nwogu	Letter relating to oil spill sabotage in 1999 is irrelevant, waste of time and prejudicial; hearsay. FRE 401-403; 802; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
1347	C35344	C35348	Email from Mojuetan to Emegere etc., dated 12/15/99, re: RE: Payment Sogholo Women	Nwogu	Email string dated Dec. 1999 unrelated to Parabe is irrelevant, waste of time and prejudicial. FRE 401-403.		
1351	C35328	C35328	Letter from Jakpa to Omole, dated 2/25/97, re: Acquisition of Land for Dibi Flowstation, Flare Site and Access Canal to Gbokoda G Location	Nwogu	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1352	C035622	C035622	Email from Nwogu to Azere, dated 2/10/98, re: FW: Olero Creek land acquisition	Nwogu	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1353	C035623	C035623	Email from Nwogu to Azere etc, dated 2/10/98, re: FW: Acquisition of additional land at Dibi 4/5 (Parcel B&C flowlines)	Nwogu	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
1354	C35653	C35653	Chevron Nigeria Limited Request for Check, payable to Amegere originated by Nwogu, 5/5/97	Nwogu	Irrelevant, waste of time, confusing. FRE 401-403.		
1358	C31078	C31079	Email from Nwogu to Emegere etc., dated 5/10/99, re: RE: Capsized Canoe	Nwogu	Email string dated May 1999 unrelated to Parabe is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802. Dupe of 1259 (Jakpa)		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1359	C29916	C29919	Chevron Nigeria Request for Cash, dated 4/26/99	Nwogu	Receipt and email string dated 4/99 are irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802. Dupe of 1017 (Jakpa)		
1360	C31779	C31780	Email from Jakpa to Emiko etc., dated 2/15/99, re: RE: Sogholo Women Association	Nwogu	Email string dated Feb. 1999 unrelated to Parabe is irrelevant, waste of time, prejudicial and improper lay testimony on environmental issues. FRE 401-403, 701. Dupe of 1325 (Iluwa), 1080 (Emiko)		
1362	C22667	C22669	Minutes of Quarterly Meeting Held with Opuama Community in the Community Town Hall on Thursday, December 7, 2000 - WITHDRAWN	Eboigbe	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		
1363	C34050	C34050	Chevron Nigeria Ltd. General Ledger Post - Detail Restatement, 5/12/99	Eboigbe	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1364	C34057	C34057	Chevron Nigeria Ltd. General Ledger Post - Voucher Entry, 5/12/99	Eboigbe	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1366	C23374	C23377	Email from Adebawo to NIGEC Public Affairs Coordinator etc., dated 11/19/99, re: Ilaje December 8 meeting Invitation	Eboigbe	FRE 401, 403, 802		
1367	C22743	C22744	Minutes of Quarterly Meeting Held with Kokodiagbene Community on March 29, 2000, at Kokodiagbene - WITHDRAWN	Eboigbe	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		
1368	C22727	C27730	Minutes of Quarterly Meeting Held with Tebu Community on April 25, 2000 at Tebu Community (Ifie Town Hall) Benin River - WITHDRAWN	Eboigbe	Minutes of meeting with Ijaw community are irrelevant, waste of time, prejudicial, hearsay and improper lay testimony re environmental issues. FRE 401-403, 701, 802.		
1369	C22719	C22721	Minutes of Quarterly Meeting Held with Ugboegungun Community on May 21, 2000, at Ugboegungun - WITHDRAWN	Eboigbe	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1370	C22711	C22713	Minutes of Quarterly Meeting Held with Tisun Community Held in the Community Town Hall on Thursday, June 29th, 2000 - WITHDRAWN	Eboigbe	Minutes of meeting with Ijaw community are irrelevant, waste of time, prejudicial, hearsay and improper lay testimony re environmental issues. FRE 401-403, 701, 802.		
1371	C32590	C32590	Chevron Nigeria Limited Imprest Fund Reimbursement, 7/8/99-7/13/99	Eboigbe	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1372	C34061	C34061	Chevron Nigeria Limited Imprest Fund Reimbursement, 4/16/99-4/21/99	Eboigbe	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1373	C20812	C29818	Minutes of Meeting Held with Idama Community, dated 8/4/97	Ribadu	Letter and handwritten notes relating to Opia/Ikenyan are irrelevant, waste of time and prejudicial. FRE 401-403.		
1374	C0188	C0197	Letter from Haastrup to Idowu re: Opia and Ikenyan Meetings, dated July 15, 1998, re: sit at home jobs	Ribadu	Letter and handwritten notes relating to Opia/Ikenyan are irrelevant, waste of time and prejudicial. FRE 401-403. Dupe of 5 (Cotta)		
1376	C22815	C22818	Minutes of Meeting Held with Idama Community, dated 6/24/1998	Ribadu	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		
1377	C29711	C29717	Minutes of Meeting Held with Benikruku Community, March 18, 1998	Ribadu	Minutes of meeting with Ijaw community are irrelevant, waste of time, prejudicial, hearsay and improper lay testimony re environmental issues. FRE 401-403, 701, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1378	C29718	C29723	Minutes of Meeting Held with Idama Community, March 18, 1998	Ribadu	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		
1379	C29797	C29802	Minutes of Meeting Held with Obaghor Community, July 3, 1997	Ribadu	Minutes of meeting with Itsekiri community is irrelevant, waste of time and hearsay. FRE 401-403, 802. Partial dupe of 1068 (Emiko)		
1380	C29792	C29796	Minutes of Meeting Held with Tebu Community, July 3, 1997	Ribadu	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802. Dupe of 1067 (Emiko)		
1381	C29752	C29756	Minutes of Meeting Held with Bateren Community, March 11, 1998	Ribadu	Minutes of meeting with non-Ilaje community is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		
1382	C29733	C29737	Minutes of Meeting Held with Gbokoda, Udo & Aja-Amita Communities, February 12, 1998	Ribadu	Minutes of meeting with non-Ilaje communities are irrelevant, waste of time, prejudicial, hearsay and improper lay testimony re environmental issues. FRE 401-403, 701, 802.		
1383	C29724	C29732	Minutes of Meeting Held with Tsekelewu Community, March 25, 1998	Ribadu	Minutes of meeting with non-Ilaje communities are irrelevant, waste of time, prejudicial, hearsay and improper lay testimony re environmental issues. FRE 401-403, 701, 802.		
1384	C29808	C29811	Minutes of Meeting Held with Amongst Bateren, Obaghor, Ebrohimi Communities and Chevron, July 29, 1997	Ribadu	Minutes of meeting with non-Ilaje communities are irrelevant, waste of time and hearsay. FRE 401-403, 802.		
1385	C29819	C29822	Minutes of Meeting Held with Ureju Community, July 16, 1997	Ribadu	Minutes of meeting with Itsekiri community is irrelevant, waste of time and hearsay. FRE 401-403, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1386	C32571	C32571	Chevron Nigeria Ltd. General Ledger Post - Voucher Entry, 8/30/99	Ribadu	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1387	C25470	C25470	Asset Management Department Organogram, re: Product Operations Division	Stapleton	Production Operations division organization chart is irrelevant, confusing and would cause undue delay. FRE 401-403.		
1388	C22522	C22522	North Offshore Morning Report, May 25, 1998	Stapleton			
1389			North Offshore Morning Report, May 24, 1998	Stapleton			
1390	C22524	C22524	North Offshore Morning Report, May 27, 1998	Stapleton			
1391	C22525	C22525	North Offshore Morning Report, May 28, 1998	Stapleton			
1392	C25448	C25500	April 1998 CNL Organization Charts Production, Logistics, Public Affairs and Security	Neves			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1393	C20382	C20382	E-mail from Connor to Weakley etc., dated 12/19/99, re: Regarding Ijaw Ultimatum	Neves	FRE 401, 403		
1394	C23013	C23014	Minutes, November 21, 1998 Community Security Work Team Meeting	Neves	Document dated 11/98 unrelated to Parabe incident is irrelevant, waste of time. FRE 401-403.		
1395	C0039	C0041	Log of Parabe Situation, dated 5/25/98-5/28/98	Neves			
1396	C25069	C25069	Service Contract between CNL and Sea Trucks Nigeria Limited, dated October 18, 1998	Neves	1998 Sea Trucks documents are irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
1397	C25088	C25088	Service Contact between CNL and Seat Trucks Nigeria Limited, November 29, 1998	Neves	1998 Sea Trucks documents are irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
1398	C25101	C25101	Service Contract between CNL and Seat Trucks Nigeria Limited, November 29, 1998	Neves	1998 Sea Trucks documents are irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
1399	C25091	C25091	Service Contract between CNL and Sea Trucks Nigeria Limited, November 29, 1998	Neves	1998 Sea Trucks documents are irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
1400	C3005	C3007	List of U.S. Employees in Nigeria - 1999	Neves	1999 list of employees in Nigeria is irrelevant, would mislead the jury and cause undue delay. FRE 401-403.		
1428	B01331	B01336	Attendance List and minutes of the Meeting held with Chevron on May 14th, 1998 at Obe-Sedara	Omosaye	Hearsay, authenticity not established. FRE 802, 901. See also Decl. of Patrick Dunlevy re Original Copy of Minutes by Monday Omosaye, ¶¶ 2-5.		
1429	B01325	B01330	Attendance List, dated 5/17/98	Omosaye	Hearsay, authenticity not established. FRE 802, 901. See also Decl. of Patrick Dunlevy re Original Copy of Minutes by Monday Omosaye, ¶¶ 2-5.		
1431	C0011	C0015	Letter from Akinkuoto to Kirkland, dated 4/29/98, re: Protest by Ilaje Citizens of Ondo State	Omosaye	Partial dupe of 106 (Haastrup) FRE 802		
1432	B00037	B00038	Letter from Concerned Ilaje Citizens to the Manager of Public Affairs, CNL, dated May 13, 1998, re: Negotiation	Omosaye	FRE 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1433	B00701	B00703	Letter from Concerned Ilaje Citizens to the Commissioner of Police, Ondo State Police Command, dated June 8, 1998, re: Of which some of them stays in Delta State and some in Ondo State	Omosaye	Partial Dupe 1614 (Ajidibo). FRE 401, 403, 802		
1460-A	C21798	C21798	Daily Flight Log for PAAN pilot Johnny Ogunjobi, dated 5/28/98	Ogunjobi			
1461-A	C21830	C21830	Daily Flight Log for PAAN pilot Johnny Ogunjobi, dated 5/29/98	Ogunjobi			
1462-A	C21773	C21772	Daily Flight Log for PAAN pilot Johnny Ogunjobi, dated 5/26/98	Ogunjobi			
1463	C26743	C26743	Handwritten Notes	Ogunjobi			
1464			Drawing by Mr. Ogunjobi of hanger and flight line area	Ogunjobi			
1465	C25211	C25211	Photo of CBL 101 barge and Parabe platform	Ogunjobi			
1466	C22083	C22085	Aeroplane Operations Manual, Pan African Airlines (Nigeria) Limited, dated May 2001	Ogunjobi	Partial dupe of 1201 (Glasby) FRE 401, 403		
1467	C21793	C21793	Daily Flight Log of PAAN pilot Johnny Enietan Ogunjobi, 5/27/98	Ogunjobi			
1468	C25012	C5023	E-mail from Cagle to mebo@compuserve.net, dated 10/22/98, re: Sensitive Subject	Ogunjobi	Partial dupe of 1017 (Kitchin) FRE 401, 403, 802		
1469	C21799	C21799	Daily Flight Log of PAAN pilot Daniel Pam, 5/28/98	Ogunjobi			
1471	C20381	C20381	E-mail from Connor to NIGEC Operations Manager etc., dated 1/6/99, re: Helicopter Operations, REDACTED	Ogunjobi	January 1999 email re: helicopters and weapons is irrelevant, unduly prejudicial and an attempt to back door Opa and Ikenyan evidence. FRE 401-403.		
1472	C25446	C25500	Chevron Nigeria Limited Organization Chart April 1998	Okelue			
1473	C25326	C25386	Chevron Nigeria Limited Organization Chart May 1999	Okelue	Irrelevant; too remote in time. FRE 401-402.		
1474	C30525	C30111	Military payments, dated October 1998	Okelue	Payments dated Oct. 1998-Feb. 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403. Partial dupe of 1163 (Origbe)		
1477	C24388	C25444	Chevron Nigeria Limited Organization Chart, dated October 1998	Omeh	Irrelevant; too remote in time. FRE 401-402.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1478	C30040	C30151	Multiple military payments, date range 12/17/98-7/27/99	Omeh	Payments dated Dec. 1998-July 1999 unrelated to Parabe incident are irrelevant, waste of time. FRE 401-403.		
1479	C25214	C25214	Photograph of CBL 101 Barge	Osupayojo			
1480	C25211	C25211	Photograph of CBL 101 Barge	Osupayojo			
1500	C19451	C19451	E-mail from Lorenz to Libbey etc., dated May 28, 1998 10:18am, re: FW: Parabe Field	Libbey	What Lorenz has been told is hearsay. FRE 802. Cumulative of other evidence including 278 & 271. FRE 401-403.		
1501	C19766	C19767	Email from Libbey to Low, dated 5/29/98 1:08am, re: FW: CNL Parabe Production Platform Situation update- Friday May 29	Libbey	Cumulative of other evidence. FRE 401-403. Schull email is hearsay. FRE 802		
1502	C20294	C20295	Email from Libbey to Low, dated May 29, 1998 1:08pm, re: FW: CNL Parabe Production Platform Situation Update	Libbey	Cumulative of other evidence. FRE 401-403. Schull email is hearsay. FRE 802		
1503	C20457	C20459	Email from Loo to Lavington, dated September 30, 1998, re: RE: Radio report on Chevron Nigeria	Libbey	Various summaries of Pacifica radio interview are hearsay. FRE 802. Cumulative of 1732. FRE 401-403		
1504	C20449	C20451	Email from Haastrup to Anyigbo etc., dated September 30, 1998, re: FW: Nigeria: Parabe Inquiry from Reuters	Libbey	Summaries of statements by reporters are hearsay. FRE 802. Cumulative of other evidence including 1829. FRE 401-403. Deji's email re: Sola's comments during Pacifica interview is hearsay. FRE 802		
1505	C036009	C036011	E-mail from Lavington to Simmons, dated September 30, 1998, re: FW: Nigeria: Parabe Inquiry from Reuters	Libbey	Cumulative of other evidence. FRE 401-403. Deji Haastrup's emails are hearsay. Summaries of comments by reporters and statements by others such as Oronto Douglas are hearsay and not based on personal knowledge. FRE 802		
1506	C19060	C19061	Email from Lorenz to Schaefer, dated 10/1/98, re: RE: Nigerian e-mails	Libbey	Email from Mr. Barnett is hearsay as is the summary of that email. FRE 802. Irrelevant, misleading and a waste of time. Document is cumulative of other evidence including 220. FRE 401-403		
1507	C17364	C17365	Article entitled "Rights-Nigeria: Oil Giant Had Role in Killings" by Danielle Knight, dated 10/2/98	Libbey	Article is hearsay as are summaries of and statements by Libbey and Omole. FRE 802. Prejudice exceeds probative value. Cumulative of other evidence. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1508	C19910	C19914	Email from Lorenz to Ilevbare etc., dated 10/7/98, re: RE: Nigeria Clashes	Libbey	NY Times story (C19914) and emails by Tunde and Deji are hearsay. FRE 802. Exchange about media statements concerning late 1998 Ijaw unrest are irrelevant and misleading./ FRE 401-403		
1509	C19916	C19918	Email from Lorenz to Kirkland etc., dated October 7, 1998, re: FW: Nigeria/Reuters Inquiry	Libbey	Summaries of statements by Reuters reporter are hearsay. FRE 802. Information about Ijaw unrest is irrelevant and misleading. Information about environment is irrelevant and prejudicial and goes beyond the limits set by the Court's in limine order. To the extent the document contains information about Parabe it is cumulative of other evidence. FRE 401-403		
1510	C19568	C19570	Email from Lorenz to Libbey and others re: Nigeria/Reuters inquiry, dated October 8, 1998	Libbey	Summaries of statements by Reuters reporter are hearsay. FRE 802. Information about Ijaw unrest is irrelevant and misleading. Information about environment is irrelevant and prejudicial and goes beyond the limits set by the Court's in limine order. To the extent the document contains information about Parabe it is cumulative of other evidence including 1019 & 223 & 1744. FRE 401-403		
1511	C036007	C036008	Email from Libbey to Lavington and others re: Nigeria/Reuters inquiry, dated October 8, 1998	Libbey	Irrelevant, misleading and prejudicial. Ms. Perez does not recall the content of the interview but recalls the CNN interview was longer than what is transcribed in the document. The quoted statements may be taken out of context. FRE 401-403. All statements are hearsay, including those attributed to Ms. Perez because she does not specifically recall making those statements. FRE 802		
1512	C19919	C19920	Email from Lorenz to Irwin re: Africare Briefing Books, dated October 9, 1998	Libbey	Cumulative of other evidence including 1830 & 282. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1513	C19925	C19927	Email from Lorenz to Loo and others re: Africare Release, dated October 12, 1998	Libbey	Africare press release is waste of time and irrelevant. FRE 401-403		
1514	C19565	C19567	Email from Lorenz to Libbey and others re: Production Stoppage in Nigeria, dated October 15, 1998	Libbey	Information about late 1998 Ijaw unrest and Abiteye incident is irrelevant, misleading and waste of time. Cumulative of other evidence. FRE 401-403		
1515	C19971	C19975	Email from Lorenz to Libbey and others re: Nigeria Conference Call, dated October 20, 1998	Libbey	Attached article is hearsay. FRE 802. Email exchange concerns media response to Ijaw situation so is irrelevant, misleading and prejudicial. FRE 401-403. Cumulative of other evidence including 1745. FRE 401-403		
1516	C19961	C19965	Email from Lorenz to Perez re: Nigeria Conference Call, dated October 19, 1998	Libbey	Attached article is hearsay. FRE 802. Email exchange concerns media response to Ijaw situation so is irrelevant, misleading and prejudicial. FRE 401-403. Cumulative of other evidence including 1745. FRE 401-403		
1517	C0390	C0394	Letter from Matzke to Derr, dated October 19, 1998, re: "Chevron Nigeria Limited (CNL) - Parabe Incident and Current African Issues"	Libbey	Summary of statements by Mike Libbey is hearsay. FRE 802. Attachment regarding Ijaw unrest is irrelevant and misleading. Document is internal to Chevron so irrelevant. Cumulative of other evidence including 332. FRE 401-403		
1518	C20027	C20028	Email from Lorenz to Lavington re: Nigeria briefing/Pacifica, dated November 6, 1998	Libbey	Summaries of conversations with Mary Ellen, Scahill and person from Concerned Citizens for Human Rights are hearsay. FRE 802. That people wanted to question Kirkland is irrelevant, waste of time and possibly prejudicial. FRE 401-403		
1519	C19397	C19398	Email from Lorenz to Mackie re: Rumor 2670 Nigeria, dated November 10, 1998	Libbey	Rumor buster note is hearsay. FRE 802. Waste of time and cumulative of other evidence. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1520	C19521	C19526	Email from Lorenz to Omole and others re: Chevron/Nigerian Military human rights violations, dated November 11, 1998	Libbey	Articles are hearsay. FRE 802. Prejudicial and misleading and cumulative of other evidence. FRE 401-403		
1521	C19659	C19660	Email from Lavington to Omole and others re: SF Nigeria Protest next week, dated November 16, 1998	Libbey	What Dave Sander heard about a protest is hearsay. FRE 802. Information regarding a possible protest is Irrelevant and prejudicial. FRE 401-403. Cumulative of other evidence including 242 & 1550. FRE 401-403		
1522	C19656	C19657	Email from Lavington to Kirkland and others re: Chron Rebuttal, dated November 20, 1998	Libbey	Draft letter is irrelevant and misleading. FRE 401-403		
1523	C25148	C25149	Chevron news "Nigeria Update"	Libbey	Cumulative of other evidence. FRE 401-403		
1524	C19111	C19112	Email from Lorenz to Soper and others re: Berkeley Resolution Letter, dated January 13, 1999	Libbey	That the Berkeley Council wrote a resolution letter is irrelevant and prejudicial. To the extent there is information about Parabe it is cumulative of other evidence. Drat is irrelevant and misleading. FRE 401-403. Summaries of resolution contained in draft letter and email exchange are hearsay. FRE 802		
1525	C19707	C19710	Email from Soper to Beebe and others re: Neuberger Berman Letter on Nigeria, dated January 15, 1999	Libbey	That the Neurberger Berman wrote a letter regarding Chevron's Nigeria operations is irrelevant and prejudicial. To the extent there is information about Parabe it is cumulative of other evidence. Drat is irrelevant and misleading. FRE 401-403. Summaries of letter contained in draft letter and email exchange are hearsay. FRE 802		
1527	C19082	C19082	Email from Lorenz to Lavington, dated 1/26/1999, re: Nigeria	Libbey	Cumulative of 1567. FRE 401-403. Email exchange concerns Opia/Ikenyan media response and is misleading, irrelevant and prejudicial. Email exchange about a demonstration is prejudicial. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1528	C19136	C19144	Email from Lorenz to Lavington re: Nigeria: Interview w/Reuters, dated February 23, REDACTED	Libbey	Reference to HRW report and Kucinich investigation is prejudicial because report responded to Opia/Ikenyan. To the extent information relates to Parabe it is cumulative of other evidence. Multiple references to Opia/Ikenyan that are irrelevant, prejudicial and misleading. Internal draft is misleading. FRE 401-403. Summary of interview with Atiya Hussain is hearsay as are summaries/references to HRW report and congressional investigation. FRE 802		
1529	C19232	C19233	Email from Lorenz to Lavington, dated 2/25/1999, re: Barges, Boats & Helicopters	Libbey	Misleading and prejudicial because response concerns boats, which relates to Opia/Ikenyan only. Irrelevant and cumulative. FRE 401-403		
1530	C19157	C19210	Email from Lorenz to Omole re: Nigeria/Pacifica Radio Transcript, dated February 25, 1999, REDACTED	Libbey	With the exception of the statements from Libbey, the transcript is hearsay. FRE 802. C19159-179 is irrelevant and has no relation to any of plaintiffs' claims. FRE 401-403. Discussion concerning Opia/Ikenyan and CNL (C19179-C19209) is prejudicial and misleading, including all statements by Libbey, which are in response to questions/discussions concerning Opia/Ikenyan. FRE 401-403		
1531	C20061	C20063	Email from Lorenz to Omole and others re: Nigeria articles -NYT & DJ, dated November 23, 1999	Libbey	Articles are hearsay as are summaries of a Chevron statement. FRE 802. Reference to protest and shareholder resolution is prejudicial. Information regarding Ijaw unrest is irrelevant and misleading. To the extent the document contains information about Parabe it is cumulative of other evidence. FRE 401-403		
1532	C19109	C19109	Email from Lorenz to Omole and others re: San Francisco Chronicle, Chevron Responds, dated November 30, 1998	Libbey	Cumulative of other evidence including 334. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1533	C19546	C19552	Email from Lorenz to Omole and others re: Chevron's Killing Fields in Nigeria, dated December 1, 1998	Libbey	References to late 1998 Ijaw crisis is irrelevant and misleading. Cumulative of other evidence. FRE 401-403. Letters/emails from citizens and articles are hearsay. FRE 802		
1534	C19688	C19690	Email from Soper to Lavington and others re: Guardian Letter, dated December 2, 1998	Libbey	Cumulative of 1558 & 254. FRE 401-403. Soper email is hearsay. FRE 802		
1535	C20078	C20078	Email from Lorenz to Soper and others re: Guardian Letter, dated December 2, 1998	Libbey	Incomplete document. FRE 106, 401-403		
1536	C20253	C20256	Email from Libbey to Golon and others re: Nigeria: U.S. Version of Statement (revision), dated March 1, 1999, REDACTED	Libbey	Impermissible references to Opia/Ikenyan that are prejudicial and misleading. The prejudice of the HRW report far exceeds its probative value, if any. The HRW report was made in response to Opia/Ikenyan. To the extent the attachment contains information about Parabe it is cumulative of other evidence. FRE 401-403		
1537	C19309	C19311	Email from Lorenz to Haastrup and others re: Nigeria: Encounter with German Journalist, dated March 4, 1999, REDACTED	Libbey	Incomplete document. FRE 106. Prejudicial, misleading and irrelevant because reporter was researching Opia/Ikenyan and there are direct references to Opia/Ikenyan. Cumulative of other evidence including 257. FRE 401-403		
1538	C20243	C20244	Email from Libbey to Perez and others re: Thoughts on today's meetings, dated March 3, 1999	Libbey	Irrelevant and a waste of time. That there was a meeting with coalition members is prejudicial and irrelevant. To the extent there is mention of Parabe it is irrelevant. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1539	C036007	C036008	Email from Libbey to Lavington and others, dated 10/8/1998, re: Nigeria/Reuters inquiry	Lavington	Irrelevant, misleading and prejudicial. Ms. Perez does not recall the content of the interview but recalls the CNN interview was longer than what is transcribed in the document. The quoted statements may be taken out of context. FRE 401-403. All statements are hearsay, including those attributed to Ms. Perez because she does not specifically recall making those statements. FRE 802		
1540	C19933	C19933	Email from Lorenz to Taylor and others, dated 10/13/1998, re: Continuing Shut-in at Escravos Swamp Fields	Lavington	Information about late-1998 Ijaw unrest is irrelevant and misleading. FRE 401-403. Schull email is hearsay. FRE 802		
1541	C0388	C0389	Email from Lorenz to Yeager and others, dated 10/15/1998, re: Parabe Web site statement	Lavington	Cumulative of other evidence. FRE 401-403		
1542	C19944	C19945	Email from Lorenz to Henley and others, dated 10/19/1998, re: Nov 4 Security Analyst Meeting	Lavington	Email correspondence about the Scenario planning meeting is irrelevant because testimony shows that the meeting was entirely unrelated to Parabe. FRE 401-403. Cumulative of other evidence. FRE 401-403		
1543	C19971	C19975	Email from Lorenz to Libbey and others, dated 10/20/1998, re: Nigeria conference call	Lavington	Attached article is hearsay. FRE 802. Email exchange concerns media response to Ijaw situation so is irrelevant, misleading and prejudicial. FRE 401-403. Cumulative of other evidence including 1745. FRE 401-403		
1544	C19986	C19996	Email from Lorenz to Rhodes and others, dated 10/22/1998 re: Example of CNL's "Good Works"	Lavington			
1545	C19559	C19561	Email from Lorenz to Mackie and others, dated 10/22/1998, re: Revised Nigeria Letter	Lavington	Reference to Saro Wiwa is irrelevant and misleading. Draft letter is irrelevant and cumulative of other evidence. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1546	C19557	C19558	Email from Lorenz to Haastrup and others, dated 10/26/1998, re: Nigeria/Parabe response III	Lavington	To the extent this relates to post-Parabe events it is irrelevant. It is also cumulative. FRE 401-403. It contains hearsay and information not based on personal knowledge. FRE 401-403		
1547	C19493	C19495	Email to Caccamo and others, dated 11/5/1998, re: Nigeria/Parabe, draft 6	Lavington	Statements attributed to Deji Haastrup are hearsay. FRE 802. Incomplete document. FRE 106. Prejudicial and cumulative of other evidence including 236 & 1746. FRE 401-403		
1548	C19517	C19520	Email from Lorenz to Lavington, dated 11/11/1998 re: FW	Lavington	Article is hearsay. FRE 802. Cumulative of other evidence and prejudicial. FRE 401-403		
1549	C19527	C19539	Email from Lorenz to Omole and others, dated 11/11/1998, re: Corporate Watch web site re: Chevron and Nigeria	Lavington	The newspaper articles are inadmissible hearsay not based on personal knowledge. FRE 602, 802. The threat of the lawsuit is a waste of time because the jury already knows there is a lawsuit and it is not probative of any issue in the litigation (C19530). FRE 401-403 FRE 802. Prejudicial and misleading; to the extent there is information about Parabe it is cumulative of other evidence. FRE 401-403		
1550	C19659	C19660	Email from Lavington to Omole and others, dated 11/16/1998, re: SF Nigeria Protest next week	Lavington	What Dave Sander heard about a protest is hearsay. FRE 802. Information regarding a possible protest is Irrelevant and prejudicial. FRE 401-403. Cumulative of other evidence including 242 & 1521. FRE 401-403		
1551	C0436	C0437	E-mail from Lavington to Wilcox etc, dated November 18, 1998, re: FW: "latest on Parabe protest and media activity"	Lavington	Comments on Chronicle and Guardian are hearsay. FRE 802. Prejudice that protest occurred and information regarding protest outweighs any potential probative value. Cumulative of other evidence. FRE 401-403		
1552	C20042	C20043	Email from Lorenz to Soper and others, dated 11/19/1998, re: Final Parabe Statement - Review	Lavington	Cumulative of other evidence and irrelevant because it is an internal draft. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1553	C19652	C19653	Email from Lavington to Kirkland and others, dated 11/20/1998, re: SF Chron letter - version 2	Lavington	Cumulative. FRE 401-403		
1554	C0395	C0400	Letter from Lavington to Matzke, dated 11/20/1998, re: Fact Sheets relating to the Parabe incident and Chevron's involvement in Nigeria	Lavington			
1555	C19640	C19641	Email from Gorell to Lorenz and others, dated 11/23/1998., re: Nigeria Letter	Lavington	Cumulative of 5401. FRE 401-403		
1556	C19637	C19637	Email from Lavington to Schull and others, dated 11/24/1984, re: KQED	Lavington			
1557	C23793	C23793	Email from Lavington to Loo and others, dated 11/23/1998, re: Nigeria/Board of Directors	Lavington			
1558	C19688	C19690	Email from Soper to Lavington and others, dated 12/2/1998, re: Guardian Letter	Lavington	Cumulative of 1534 & 254. FRE 401-403. Soper email is hearsay. FRE 802.		
1559			Meet and confer with defendants on description for this exhibit.	Lavington	Cumulative. FRE 401-403. Irrelevant because there is no evidence that the interview actually occurred and Lavington could not recall. FRE 401-403. Emails from CNL employees hearsay. FRE 802		
1560	C20106	C20106	E-mail from Lorenz to Omole etc., dated December 15, 1998, re: RE: Call From the Saturday Star of Joburg	Lavington	Email is hearsay. FRE 802. Media response regarding 1998 Ijaw crisis is irrelevant and misleading. FRE 401-403. Cumulative of 300. FRE 401-403		
1566	C30031	C30085	Military Payments dated 1/3/1999 - 1/8/1999 (C30085 removed)	Lavington	Payments dated Jan. 1999 are irrelevant, waste of time and prejudicial. FRE 401-403. Partial dupe of 1053 (Nwokolo)		
1567	C19082	C19082	Email from Lorenz to Lavington, dated 1/26/1999, re: Nigeria	Lavington	Cumulative of 1527. FRE 401-403. Email exchange concerns Opia/Ikenyan media response and is misleading, irrelevant and prejudicial. Email exchange about a demonstration is prejudicial. FRE 401-403		
1568	C19340	C19342	Email from Lorenz to Irwin and others, dated 2/4/1999, re: Media Response to Hart Europe (re: Nigeria)	Lavington	This exhibit is cumulative of Exhibit 1837. FRE 401-403. Email exchange is misleading and prejudicial because it concerns media inquiries about Opia/Ikenyan. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1569	C23017	C23023	Email from Lorenz to Johnson and others, dated 2/11/1999, re: Nigeria Award of Environmental Excellence	Lavington	Irrelevant and prejudicial. Information about the environment is limited to plaintiffs' motive for taking over the Parabe platform and to a limited time period (1996-May 1998) and geographic area (Ilajeland). This award was given after the takeover. FRE 401-403. Email exchange with CNL employees is hearsay. FRE 802		
1571	C19343	C19344	Email from Lorenz to Lavington, dated 2/8/1999, re: AY Story, REDACTED	Lavington	Impermissible reference to Opia/Ikenyan; misleading and prejudicial. FRE 401-403. Irrelevant because this is an internal document and not released to the public. FRE 401-403		
1572	C19145	C19147	Email from Lorenz to Lavington, dated 2/24/1999, re: Nigeria: Interview w/Reuters, REDACTED	Lavington	Reference to congressional investigation is prejudicial. Impermissible reference to Opia/Ikenyan that is misleading and prejudicial. FRE 401-403. Golon summary of statements by Reuters reporter is hearsay. FRE 802		
1573	C22895	C22900	Email from Irwin to Kirkland and others, dated 3/10/1999, re: LETTER TO CONGRESS, REDACTED	Lavington	Reference to congressional investigation is prejudicial. Impermissible reference to Opia/Ikenyan that is misleading and prejudicial. FRE 401-403. Cumulative of other documents and testimony relating to Parabe. FRE 401-403		
1574	C19232	C19233	Email from Lorenz to Lavington, dated 2/25/1999, re: Barges, Boats & Helicopters	Lavington	Misleading and prejudicial because response concerns boats, which relates to Opia/Ikenyan only. Irrelevant and cumulative. FRE 401-403		
1575	C19304	C19305	Email from Lorenz to Haastrup and others, dated 2/26/1999, re: HUMAN RIGHTS WATCH AFRICA REPORT	Lavington	Cumulative of 256. Reference to HRW report is prejudicial because report responded to Opia/Ikenyan. To the extent information relates to Parabe it is cumulative of other evidence. FRE 401-403. Correspondence by CNL employees is hearsay. FRE 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1577	C20228	C20231	Email from Perez to Libbey and others, dated 3/17/1999, re: Nigeria Memo, REDACTED	Lavington	Cumulative. FRE 401-403. Reference to HRW report, congressional investigation and Opia/Ikenyan is prejudicial and misleading. To the extent information relates to Parabe it is cumulative of other evidence. FRE 401-403. Subsequent remedial measure. FRE 407		
1578	C23741	C23741	Email from Lorenz to Lavington, dated 3/18/1999, re: Nigeria Parabe update	Lavington	Document is irrelevant and misleading. Lavington testified that he could not recall whether the change was actually made or if there was any information in particular that was received at that time to cause the change. FRE 401-403. Hearsay. FRE 802		
1579	C23813	C23819	Email from Gorell to Beebe, etc., dated 4/22/99 re: FW: KTD-Nigeria, with messages for Derr at Annual Meeting, REDACTED (page C23817 removed)	Lavington	Cumulative. FRE 401-403. Irrelevant and misleading. Document is from April 1999 and to the extent the document contains information about Parabe it is cumulative of other evidence. Impermissible reference to Opia/Ikenyan. Prejudice of congressional investigation and stockholder resolution outweighs possible probative value. FRE 401-403		
1580	C23538	C23550	Email from Omole to Lavington, dated 5/17/1999. re: Chevron Nigeria Limited	Lavington	Document is from CNL and hearsay. FRE 802. Irrelevant, misleading and prejudicial. Impermissible reference to Opia/Ikenyan. FRE 401-403		
1581	C26778	C26780	Distribution List for COPI and Corporate Emergency Contact Information, dated 12/11/1998	Lavington	FRE 407. Post-Parabe document not relevant to Parabe incident. FRE 401-403.		
1582	C24015	C24015	Email from Reddell to Shadiya and others, dated 12/9/1998, re: Rotational Location Premiums	Lavington	December 1998 letter re: location premiums is irrelevant, remote in time, and is not evidence of specific agency. FRE 401-403.		
1583	C21806	C21807	Daily Flight Log dated May 28, 1998	Madl			
1584	C21759	C21760	Daily Flight Log dated May 25, 1998	Madl			
1585	C21778	C21779	Daily Flight Log dated May 26, 1998	Madl			
1586	C21795	C21797	Daily Flight Log dated May 27, 1998	Madl			
1592			Pages from logbook dated March 1998-November 1998	Croot	No objection for 5/25 to 5/28; FRE 401, 403 for remainder		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1601	C24015	C24017	E-mail from Tammy Reddell to Shadiya Supo, et al. dated December 9, 1998 re: Rotational Location Premiums	Malling	December 1998 letter re: location premiums is irrelevant, remote in time, and is not evidence of specific agency. FRE 401-403.		
1602	C038240	C038376	Participant Report: Rotational International Assignments Survey, July 1998, Exxon Company, International	Malling	July 1998 Survey is irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
1603	C17763	C17775	Fixed Duration Assignment Offer	Malling	1998 job assignment is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
1604	C038379	C038385	PowerPoint presentation dated 1/15/97 re: Expatriate Policy Study	Malling	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
1605	C039001	C039026	Letter from R. Matzke to K.T. Derr and J.N. Sullivan re: Expatriate HR Policy Study. Dated August 27, 1997	Malling	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
1606	C038386	C038440	Policies for Chevron's International Workforce	Malling	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
1607			Stipulation regarding the 30(B)(6) Deposition beginning September 18, 2005	Etikerentse	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
1608			Notice of Deposition of Defendant ChevronTexaco Overseas Petroleum and Request to Produce Documents Pursuant to FRCP 30(b)(6) (Phase II)	Etikerentse	Deposition notice is irrelevant and would confuse the jury. FRE 401-403.		
1609	C044389	C044400	Log of tankers and their destinations from January 1998 - December 1998	Etikerentse	Destination of tankers and related logs are irrelevant, unduly prejudicial and would confuse the jury. FRE 401-403.		
1610			Notice of the Deposition of Chevron Nigeria Limited Pursuant to 30(b)(6), dated September 19-23, 26, 2005	Etikerentse	Deposition notice is irrelevant and would confuse the jury. FRE 401-403.		
1611A	C044401	C044412	Spreadsheets dated January 1999 to November 1999 showing destination of various oil tankers	Howard	1999 Crude shipments are irrelevant, unduly prejudicial and would confuse the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1611	C044401	C044412	Log of tankers and their destinations from January 1999 - December 1999	Etikerentse	1999 Crude shipments are irrelevant, unduly prejudicial and would confuse the jury. FRE 401-403.		
1612	C3382	C3462	Joint Operating Agreement between Nigerian National Petroleum Corporation and Gulf Oil Company (Nigeria) Limited - July 1991, dated July 25, 1991	Etikerentse			
1612	B00708	B00709	Letter from Concerned Ilaje Citizens to The Secretary CAHR, dated June 16, 1998	Ajidibo	FRE 401, 403, 802		
1613	C13405	C044479	Counsel and Service Agreement Between COPI & CNL for charging C & S Fees and Purchase Fee dated February 27, 1987	Etikerentse			
1614	B00701	B00702	Letter from Concerned Ilaje Citizens to the Commissioner of Police, Ondo State Police Command, dated June 8, 1998, re: Of which some of them stays in Delta State and some in Ondo State	Ajidibo	Partial Dupe 1433 (Omosaye). FRE 401, 403, 802		
1614	B1546	B1548	Declaration of Custodian of Records and Letter from Ajewole to Oriabure re: Aridukeja Omoseibe, dated September 5, 2005	Laibi	FRE 403, 702, 802		
1614	C041993	C041996	NNPC/CNL Joint Venture Production and Lifting Summary (BBLS) 1996-1999	Etikerentse	Crude lifting summary is irrelevant, unduly prejudicial and would confuse the jury. FRE 401-403. Summary of 1996-1997 and 1999 are too remote in time. FRE 401-403.		
1614A	C13405	C13420	Counsel and Service Agreements dated February 27, 1987	Howard			
1615	B1549	B1551	Re-Application for the Autopsy Report of Arolika Irowarinun, dated October 6, 2005, including autopsy report of Jolly Adehin and Arodelika Omoseibe	Laibi	Dupe of 2706 (Ajewole). FRE 403, 702, 802		
1615	B00880	B00880	Chevron Nigeria Limited List of Contractors and Contract Awards 1999	Etikerentse	1999 Contractor awards are irrelevant, too remote in time and would confuse the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1616	B1547	B1547	Declaration of Custodian of Records by Adesina Kayode, dated August 31, 2005	Adesina	FRE 802, 901		
1616			Country Reports on Human Rights Practices for 1995 Nigeria, dated March 1996	Etikerentse	Report is too remote, relates to law enforcement activity in different states, especially the Ogoni people and the Delta state police and is highly prejudicial. FRE 401-403. Portions of the report recite secondhand hearsay assertions. FRE 602, 802, 805; United States v. Mackey, 117 F.3d 24, 28-29 (1st Cir. 1997); <i>Budden v. United States</i> , 748 F. Supp. 1374 (D. Neb. 1990), <i>vacated on other grounds</i> , 963 F.2d 188 (8th Cir. 1992); <i>In re Air Crash Disaster</i> , 720 F. Supp. 1493, 1497 (D. Colo. 1989); <i>Fraley v. Rockwell Int'l Corp.</i> , 470 F. Supp. 1264, 1267 (S.D. Ohio 1979). Extensive reliance on double hearsay may render portions or all of a public report unreliable. See <i>Beech Aircraft Corp. v. Rainey</i> , 488 U.S. 153, 167 (1988); <i>Denny v. Hutchinson Sales Corp.</i> , 649 F.2d 816, 821 (10th Cir. 1981). Most of the report is hearsay, unsupported assertions and excerpts from advocacy pieces or unidentified sources. Portions are irrelevant (e.g., freedom of religion, disappearance, and discrimination) and are not admissible to show Navy rescue violated any law. FRE		
1617	B000001464	B000001541	Bowoto's Medical Records 1998	Adesina	Partial dupe of 2016 (Kushel). FRE 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1617			U.S. Department of State Nigeria Country Report on Human Rights Practices for 1997, dated January 30, 1998	Etikerentse	Report is too remote, relates to law enforcement activity in different states, especially the Ogoni people and the Delta state police and is highly prejudicial. FRE 401-403. Portions of the report recite secondhand hearsay assertions. FRE 602, 802, 805; United States v. Mackey, 117 F.3d 24, 28-29 (1st Cir. 1997); <i>Budden v. United States</i> , 748 F. Supp. 1374 (D. Neb. 1990), <i>vacated on other grounds</i> , 963 F.2d 188 (8th Cir. 1992); <i>In re Air Crash Disaster</i> , 720 F. Supp. 1493, 1497 (D. Colo. 1989); <i>Fraley v. Rockwell Int'l Corp.</i> , 470 F. Supp. 1264, 1267 (S.D. Ohio 1979). Extensive reliance on double hearsay may render portions or all of a public report unreliable. See <i>Beech Aircraft Corp. v. Rainey</i> , 488 U.S. 153, 167 (1988); <i>Denny v. Hutchinson Sales Corp.</i> , 649 F.2d 816, 821 (10th Cir. 1981). Most of the report is hearsay, unsupported assertions and excerpts from advocacy pieces or unidentified sources. Portions are irrelevant (e.g., freedom of religion, disappearance, and discrimination) and are not admissible to show Navy rescue violated any law. FRE		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1618	B00165	B00273	Human Rights Watch The Price of Oil, Corporate Responsibility and Human Rights Violations in Nigeria's Oil Producing Communities, copyrighted January 1999	Etikerentse	Human Rights Watch report was published after the Parabe incident, so is irrelevant as to notice. FRE 401-403. It is hearsay and therefore inadmissible. FRE 802; See <i>Garvin v. City of Philadelphia</i> , CIV.A. 02-2214, 2003 WL 402247, at *3 (E.D. Pa. Feb. 24, 2003) (describing document drafted by Human Rights Watch as a "hearsay document" and refusing to rely on the report to deny summary judgment). Statements in a media or press publication asserted for the truth of the matter are hearsay. See <i>Larez v. City of Los Angeles</i> , 946 F.2d 630, 642-44 (9th Cir. 1991); <i>Doe v. Texaco, Inc.</i> , No. C06-02820 WHA, 2006 WL 2850035, at *3 (N.D. Cal. Oct. 5, 2006); <i>Churchill Village, L.L.C. v. General Elec. Co.</i> , 169 F. Supp. 2d 1119, 1131 (N.D. Cal. 2000); <i>accord Chicago Firefighters Local 2 v. City of Chicago</i> , 249 F.3d 649, 654 (7th Cir. 2001); <i>Horta v. Sullivan</i> , 4 F.3d 2, 8-9 (1st Cir. 1993). It is not authenticated. FRE 901. It contains non-Parabe information including information relating to Opia/Ikenyan which is irrelevant and prejudicial. FRE 401-403.		
1618	B00418	B00418	Letter from Ajaka to Whom it may concern re: Mr. Larry Bowoto (Hospital Np. 084A), dated July 1, 2000	Ajaka	FRE 802		
1619	B00420	B00425	Larry Bowoto's medical bills from July 7, 1998 to September 30, 1999	Ajaka	FRE 401, 403, 802		
1619	B00274	B00312	Nigeria Crackdown in the Niger Delta, by Human Rights Watch, dated May 1999	Etikerentse	Irrelevant and prejudicial because press release relates to Opia/Ikenyan and is after Parabe; is double hearsay. FRE 401-403, 802		
1620	B00114	B00122	Letter from Kirkland to Manby re: January 23, 1998 letter, dated March 11, 1998	Etikerentse	All references to Opuama should be excluded because the prejudice far outweighs the probative value. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1620	B00427	B00427	Letter from Ajaka to Whom it may concern re: Mr. Larry Bowoto (Hospital Np. 084A), dated March 5, 2001	Ajaka	FRE 802		
1621	B00428	B00428	Benin Radiological Services Report of Bowoto's Left Lower Arm/Elbow	Ajaka	FRE 802		
1621			Nigeria campaign for human rights reform on Amnesty.com, dated July 1996	Etikerentse	Articles downloaded from Amnesty.com are hearsay. FRE 802.		
1622	C19345	C19348	Email from Lorenz to Irwin and others re: Issues document re meeting with representatives, dated February 18, 1999	Etikerentse	The prejudice of the HRW report far exceeds its probative value, if any. The report relates to Opia/Ikenyan and is therefore inadmissible. FRE 401-403. Attachment and email from Sola are hearsay. FRE 802. To the extent there is any information about Parabe it is cumulative of other evidence. FRE 401-403		
1623			The Voluntary Principles on Security and Human Rights	Etikerentse	The Voluntary Principles, which did not exist at the time of Parabe, are irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407.		
1624	C0120	C0122	Conduct guidelines issued by CNL to GSF entitled, "Government Security Agents Escravos," March 1998	Etikerentse	Partial Dupe of 511 (MBA). No objection to C0120-0121; FRE 401, 403, 901 to C0122		
1625			The Voluntary Principles on Security and Human Rights	Etikerentse	The Voluntary Principles, which did not exist at the time of Parabe, are irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407.		
1625			Map showing Warri and Escravos Areas, dated 9/8/04	Sagay			
1626	C35007	C35010	Security Advisors Report Week 6 Escravos Nigeria by Webb, dated June 6, 1999	Etikerentse	Security report dated June 1999 unrelated to Parabe is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability; hearsay. FRE 401-403, 407, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1627	C13362	C13377	Security Review Team Report dated 2/11/99, entitled "Security Review of CNL Field Locations."	Etikerentse	Security review dated Feb. 1999 unrelated to Parabe is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407. Dupe of 457 (Uwaka)		
1627			Report titled, "The Extraction Industry in the Niger Delta and the Environment," by Professor I.E. Sagay, SAN	Sagay	Document is hearsay. FRE 802. The opinions within the document are inadmissible pursuant to the Court's in Limine Order on Sagay (1208). The document is irrelevant and prejudicial. FRE 401-403, 702		
1628	C036006	C036006	Letter from Manby to Kirkland re: Parabe Platform Incident, dated October 15, 1998	Etikerentse	Letter has multiple levels of hearsay. FRE 802. That HRW was sending CNL inquiries regarding Parabe is prejudicial. FRE 401-403.		
1628			Article, "Crime Against Izon People," by Ofoni Williams, dated October 4, 2005	Sagay	Irrelevant environmental article, unrelated to Parabe or Chevron entity. More prejudicial than probative. FRE 401-403. Hearsay, not based on personal knowledge. FRE 602, 802.		
1629	C29492	C29496	Minutes re: Meeting With Ilaje communities held on June 3. at the Ilaje local government council, (No Suggestions)	Etikerentse	Waste of time, hearsay. FRE 403, 802.		
1629			Collection of articles from Vanguard and Warri Mirror, dated 2/28/05 and 2/7/05	Sagay	Multiple layers of hearsay. FRE 802 articles are irrelevant, misleading and prejudicial. They involve a time period and incident (2005 takeover of Escravos) not applicable to this case. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1630	C23180	C23181	Email from Walonen to Brown re: Facilitating Payment, dated June 17, 1996	Etikerentse	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
					Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1631	C043292	C043670	Balance Sheet	Etikerentse			
1632	C21137	C21139	Military Payments dated 12/30/1998	Etikerentse	FRE 401, 403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1633	C042415	C042415	Account Statement	Etikerentse	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1634	C043599	C043599	Account Statement	Etikerentse	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1635	C043612	C043612	Account Statement	Etikerentse	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1636	C044087	C044092	Departmental Cost Center Codes	Etikerentse	Cost center codes are irrelevant; waste of time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1637	C042027	C042070	Updated Account Statement, updated June 2, 2005	Etikerentse	2005 Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. <i>See Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); <i>see also Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1638	C32562	C32590	Chevron Nigeria Limited Posting Edit Reports, dated August 30, 1999	Etikerentse	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1639			Chevron Nigeria Limited A/P Voucher Report, dated February 3, 1999	Etikerentse	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1640	C042380	C042380	Log with numbers	Etikerentse	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1641	C1882	C1905	Chevron Nigeria Limited Report and Financial Statements, dated December 31, 1999	Etikerentse	Exhibit is too remote; irrelevant. FRE 401-403.		
1642			Handwritten note	Etikerentse	Exhibit is confusing, irrelevant and would mislead the jury. FRE 401-403.		
1643	C19053	C19057	E-mail from Lorenz to Taylor etc., dated 10/21/98, re: RE: Security Posture- CNL	Etikerentse			
1644	C35013	C35020	Security Action Plan Review CNL, Escravos, dated September 23, 1999	Etikerentse	Security Action Plan Review dated Sept. 1999 is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability; hearsay. FRE 401-403, 407, 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1645	C32581	C32581	Chevron Nigeria Ltd, General Ledger Post Voucher Entry, 7/23/99	Etikerentse	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401- 403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security- related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v.</i> <i>Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. <i>See Sonora Diamond</i> <i>Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v.</i> <i>Bestfoods</i> , 524 U.S. 51, 71-72 (1998); <i>see</i> <i>also Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1646	C20853	C20853	Chevron Nigeria Ltd., A/P Voucher Journal Report, dated 6/18/98	Etikerentse	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1647	C35513	C35513	Military payments dated December 22, 1999	Etikerentse	1999 Check request for SPY salaries is irrelevant, waste of time. FRE 401-403.		
1648			Notice of Deposition of Chevron Corporation pursuant to FRCP 30(b)(6)	Soler	Deposition notice is irrelevant and would confuse the jury. FRE 401-403.		
1649	C17037	C17037	Document entitled Assignment and Assumption Agreement and Acknowledgement	Soler	1999 assignment document is irrelevant and too remote in time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1650	C42084	C42119	Document entitled Intercompany Guidelines & Policies	Soler	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401- 403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security- related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v.</i> <i>Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. <i>See Sonora Diamond</i> <i>Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v.</i> <i>Bestfoods</i> , 524 U.S. 51, 71-72 (1998); <i>see</i> <i>also Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1651	C13572	C13624	Intercompany Realignment Entries Monthly Realignment (Based on Receivable Balances) Over \$50,000 as of 12/31/97	Soler	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1652	C31340	C31355	1997-1999 COPI Business Plan Vol. 2	Soler	COPI 1996 Business Plan regarding Opolo Field development is irrelevant, too remote in time, would confuse the jury and cause undue delay. FRE 401-403. Duplicative of 5095.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1653	C42077	C42083	Document re: Intercompany Receivable/Payable Settlements		Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1653	C42077	C42083	Intercompany Receivable/Payable Settlements	Soler	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1653A	C42077	C42083	Document re: Intercompany Receivable/Payable Settlements	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1654	C15005	C15014	Comparative Balance Sheet - Current Month vs. Last (for COPI)	Soler	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401- 403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security- related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v.</i> <i>Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond</i> <i>Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v.</i> <i>Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1655	C036045	C036047	Letter from Winter to Crowe etc., dated August 1, 1996, re: Second Quarter 1997 Intercompany Dividends and Capital Contributions	Soler	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1660	C15015	C15017	Intercompany Settlement, dated August 1996 & June 1996	Soler	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1675	C15069	C15069	Letter from Steffinger to Kuba re: Intercompany Settlement - September 1996, dated August 22, 1996	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401- 403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security- related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v.</i> <i>Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. <i>See Sonora Diamond</i> <i>Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v.</i> <i>Bestfoods</i> , 524 U.S. 51, 71-72 (1998); <i>see</i> <i>also Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1676	C16861	C16864	Email from Steffinger to Soler and others re: Intercompany Settlement - May 1999	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1677	C17045	C17045	Chart entitled June 30, 1999 Intercompany Balances	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1677A	C17045	C17045	Chart entitled June 30, 1999 Intercompany Balances	Howard	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1678	C14858	C14864	Letter from Steffinger to Kuba re: Intercompany Settlement - March 1996, dated March 1, 1996	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1679	C15766	C15782	Joint Operating Agreement between Nigerian National Petroleum Corporation and Gulf Oil Company (Nigeria) Limited - July 1991	Kuba			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1680	C16680	C16690	Letter from Steffinger to Kuba re: intercompany settlement - February 1999, dated January 22, 1999	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401- 403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security- related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v.</i> <i>Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. <i>See Sonora Diamond</i> <i>Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v.</i> <i>Bestfoods</i> , 524 U.S. 51, 71-72 (1998); <i>see</i> <i>also Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1681	C12251	C12253	Email from Steffinger to Estrada and others re: CNL 1996 4th Quarter and Final Dividend, dated April 4, 1997	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1682	C12244	C12250	Letter from Lawrence to Crowe and others re: Fourth Quarter 1999 Intercompany Dividends and Capital Contributions, dated March 6, 2000, with attached Intercompany Dividends and Capital Contribution Settlements	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1683	C12292	C12295	Email from Jamshed to Walsh and others re: Chevron Overseas Petroleum - Intercompany Assignment and Realignment, dated August 4, 1999	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401- 403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security- related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v.</i> <i>Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. <i>See Sonora Diamond</i> <i>Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v.</i> <i>Bestfoods</i> , 524 U.S. 51, 71-72 (1998); <i>see</i> <i>also Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1684	C17042	C17044	Email from Kuba to Brown and others re: Chevron Ltd - Cash Settlement of Restricted Account Balance, dated July 22, 1999	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1685	C12282	C12284	Email from Kuba to Wilkinson and others re: CNL & COCNL Final Dividend Declaration for 1998 (1999 U.S. GAAP dividend), dated June 15, 1999	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1686	C042084	C042119	Intercompany Guidelines and Policies	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1687	C043292	C043670	Log of numbers	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1688	C12254	C12254	Email from Kuba to Benson and others re: CNL 1997 2nd Quarter Dividend, dated October 9, 1997	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1689	C15334	C15334	Letter from Kuba to Steffinger and others re: Intercompany Settlements - March 1997, dated March 10, 1997	Kuba	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1690	C1586	C1592	Policy 30, Management, Changes to Corporate Structure, Directors or Officers, dated effective 1/1/94; Policy 40, Management - Organization Plans, Policy 50, Crisis Management	Soler	Exhibit is incomplete. FRE 106. Compilation of policies would confuse and mislead the jury. Policy 30 is not evidence of specific agency. FRE 401-403.		
1691	CS05014	CS05021	Email to Malinowski etc., re: Nigeria Lawsuit	Soler	1999 Email regarding other incidents including Opia and Ikenyan is irrelevant, unduly prejudicial and would confuse the jury. FRE 401-403.		
1692	C1273	C1273	Document entitled State of Delaware Office of the Secretary of State, dated 12/30/94	Soler			
1693	C1456	C1464	Letter to Primus from Railton, dated 1/11/99, re: Nigerian Restructuring Agreement, with attached Restructuring Agreement	Soler	1999 corporate restructuring is irrelevant, confusing, unduly prejudicial and would mislead the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1694	C46606	C46607	Document entitled Chevron Overseas Petroleum Inc., Unanimous Consent of the Board of Directors Without a Meeting, dated effective 10/28/98	Soler	October 1998 corporate document re: oil marketing is irrelevant, too remote in time and would confuse the jury. It is also unsigned and thus not final. FRE 401-403.		
1700			Notice of Deposition of Chevron Corporation pursuant to FRCP 30(b)(6), date signed 10/4/05	Simpson	Deposition notice is irrelevant and would confuse the jury. FRE 401-403.		
1701			List of individuals with whom Simpson spoke to prepare for his deposition	Simpson	Persons deponent spoke with is hearsay and irrelevant. FRE 401-403, 802.		
1702	C46568	C46568	Spreadsheet entitled U.S. Based CNL employee/visitor direct deposit summary September 1997	Simpson	Information about employee pay in 1997 is irrelevant, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
1703	C46569	C46570	Letter from Hartley to Bowser, dated August 11, 1997, re: invoice for J.D. Edwards	Simpson	Letter regarding 1997 software invoice is irrelevant, too remote in time and is not evidence of specific agency. FRE 401-403.		
1704	C2139	C2140	Letter from Koelmel to Brown etc., dated May 16, 1996, re: GO-113- COPI San Ramon- Gbokoda Field Reservoir Mapping	Simpson	1996 letter re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
1705	C46564	C46564	Document entitled Chevron Overseas Petroleum, Inc. request for check GO 63 OP	Simpson	Check request re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1706	C42077	C42083	Document entitled Intercompany Receivable/Payable Settlement	Simpson	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1706	C0039	C0041	Log of Parabe Situation, dated 5/25/98-5/28/98	McGowan			

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1707	C45588	C45589	Document entitled Intercompany/Intracompany Accounts- Advances and Investments GLF 170, dated 7/1/91	Simpson	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401- 403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security- related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v.</i> <i>Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. <i>See Sonora Diamond</i> <i>Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v.</i> <i>Bestfoods</i> , 524 U.S. 51, 71-72 (1998); <i>see</i> <i>also Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158.		
1707	C13338	C13329	Escravos Oil Sales Agreement signed by Kirkland and Garrett, dated 10/1/96	Howard	1996 crude sales agreement is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1708	C42071	C42076	Spreadsheet entitled Intercompany Restricted Balances S/R, date range August 1997	Simpson	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1708			Declaration of Steven Howard in Support of Defendants Motion for Summary Judgment (Phase One), dated 5/23/03	Howard	Hearsay. FRE 802.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1709	C12293	C12295	Email from Kuba to Walsh, dated 8/4/99, re: FW: Chevron Overseas Petroleum-Intercompany Assignment and Realignment	Simpson	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1709	C1794	C1796	Letter from Geagea to Kirkland, dated October 7, 1996, re: Side Letter to CIT/CNL Cooperation Agreement	Howard	1996 agreement is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
1710			Document beginning with "I have reviewed the attached lists and looked up available information on those six voyages involving Chevron vessels," from Tomsovic, dated range 5/1/96-4/1/97	Simpson	1996-1997 shipping information for crude is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
1710	C1788	C1789	Document entitled, "CIT/COCNL/CNL Cooperation relationship Nigeria"	Howard	Cooperation agreement for crude sales is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
1711	C46596	C46605	Spreadsheet of vessel information, date range 1/1/97-12/1/99	Simpson	1996-1997 shipping information for crude is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1711	C13342	C13346	1996 Pennington Sales Agreement, dated 10/1/96; 1997 Pennington Sales Agreement, dated 1/1/1997	Howard	1996 crude sales agreement is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
1712	C46571	C46595	Document entitled "LPG FOB Sale Agreement," dated 12/7/95	Simpson	1995 agreement for sale of liquefied petroleum gas is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
1712	C17764	C17764	Fixed Duration Assignment Offer for Scott Davis, date signed 12/30/96	Howard	1996 job assignment is irrelevant, remote in time, unduly prejudicial and would mislead the jury. FRE 401-403.		
1713	C13405	C13411	Document entitled "Counsel and Service Agreement," dated 2/27/87	Simpson			
1713	C13328	C13328	Agreement between Wilcox and Castagna, dated 4/11/01, re: Renewal of Co-Operation Agreement and Purchase/Sales Contracts	Howard	2001 agreements re: crude sales are irrelevant, too remote in time, unduly prejudicial and would mislead the jury. FRE 401-403.		
1714	C13412	C13414	Document entitled "Amendment to Counsel and Service Agreement," dated 3/16/88	Simpson			
1714	C1802	C13420	Counsel and Service Agreement between COPI & CNL for Charging C & S Fees and Purchase Fee, date 2/27/87	Howard			
1715	C13402	C13404	Document Entitled "Amendment to Counsel and Service Agreement," dated 11/29/89	Simpson			
1715	C1980	C2059	Joint Operating Agreement between Nigerian National Petroleum Corporation and Gulf Oil Company (Nigeria) Limited - July 1991	Howard			
1716	C13395	C13397	Document entitled "Amendment to Counsel and Service Agreement," dated 1/21/93 & 3/15/93	Simpson			
1716	C2437	C2437	Work Requisition to Pryor signed by Schull, dated 12/3/99	Howard	1999 work request for expat employees is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1717	C13418	C13418	Document entitled "Chevron Overseas Petroleum, Inc. 1997 Counsel and Service Rate Schedule"	Simpson			
1717	C13393	C13394	Assignment Agreement between Chevron Overseas Petroleum Inc. and Chevron Overseas Petroleum, a division of CUSA, dated 2/15/94	Howard			
1718	C044479	C044479	Document entitled "Chevron Overseas Petroleum, Inc. 1998 Counsel and Service Rate Schedule"	Simpson			
1718	C1810	C1833	Chevron Nigeria Limited Report and Financial Statements, dated December 31, 1996	Howard	Irrelevant; too remote in time. FRE 401-402.		
1719	C13419	C13420	Letter from Potter to Keyes etc., dated June 13, 1996, re: Counsel & Service Fees Reduced Rates for 1996	Simpson	Irrelevant; too remote in time. FRE 401-402.		
1719	C1941	C1941	Extracts from the Minutes of the 81st Meeting of the Directors..., dated March 14, 1997	Howard	Irrelevant; too remote in time. FRE 401-402.		
1720	C13393	C13394	Assignment Agreement between Chevron Overseas Petroleum Inc. and Chevron Overseas Petroleum, a division of CUSA, dated 2/15/94	Simpson			
1720	C1946	C1948	Minutes from the 87th Meeting of the Directors..., dated May 17, 2000	Howard	2000 meeting minutes are irrelevant and too remote in time. Document is unsigned and thus not final. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1721	C12276	C12276	E-Mail from Steffinger to Kuba etc., dated 7/6/99, re: RE: CNL Final Dividend Declaration for 1998	Simpson	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1721	C1944	C1945	Minutes from the 28th Annual General Meeting..., dated June 7, 1999	Howard	Irrelevant; too remote in time. FRE 401-402.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1722	C46613	C46626	Document entitled "COPI Business Plan 2000 to 2002," dated October 1999	Simpson	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1722	C1882	C1905	Chevron Nigeria Limited Report and Financial Statements, dated December 31, 1999	Howard	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1723	C0678	C0702	Report cover entitled "Chevron Corporation 1998 Annual Report," with one page from the report	Simpson	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1723	C23184	C23184	Nigeria - CNL Sensitive Payments (1997 & 1998), multiple dates	Howard	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		
1724	C31426	C31453	Document entitled "1999-2001 COPI Business Plan," dated October 1998	Simpson	Portions of exhibit relating to exploration and environmental issues are speculative, irrelevant, unduly prejudicial and would mislead the jury. Exhibit is too remote in time. FRE 401-403, 602.		
1724			Chevron Corporation's Response to Plaintiffs' Special Set of Interrogatories Pursuant to Court Order of March 16, 2001	Howard	Exhibit is improperly designated. Proper procedure was to designate it as part of discovery. Irrelevant; confusing to the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1725	C1603	C1606	Chevron Policy Manual, Policy 120, Financial- Appropriations	Howard	1999 policy on financial controls is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1725	C46391	C46392	Email from Harris to Lee etc., dated 8/25/98, re: FW: SAP 759003xx	Simpson	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
1726	C17355	C17356	Transcript from an interview with CNN on November 21, 1998	Perez	Irrelevant, misleading and prejudicial. Ms. Perez does not recall the content of the interview but recalls the CNN interview was longer than what is transcribed in the document. The quoted statements may be taken out of context. FRE 401-403. All statements are hearsay, including those attributed to Ms. Perez because she does not specifically recall making those statements. FRE 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1726	C36007	C36008	Email from Libbey to Lavington etc., dated 10/8/98, re: RE: Nigeria/Reuters inquiry	Simpson	Summaries of statements by Reuters reporter are hearsay. FRE 802. Information about Ijaw unrest is irrelevant and misleading. Information about environment is irrelevant and prejudicial and goes beyond the limits set by the Court's in limine order. To the extent the document contains information about Parabe it is cumulative of other evidence including 1019 & 223 & 1744, 1511 & 1539. FRE 401-403		
1726	C33428	C33428	CNL Invoice Control Sheet	Howard	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1727	C19064	C19066	Email from Lorenz to Williams, dated 9/30/98, re: RE: Pacifica Radio Interview	Perez	Statements regarding percentage of COPI's earnings is not based on personal knowledge. FRE 602. Summaries of Pacifica radio interview and Sola's email are hearsay. FRE 802. Cumulative of other evidence including 1727. FRE 401-403		
1727	C33622	C33623	Invoice - 1/3/98 through 1/8/98	Howard	Irrelevant, waste of time. FRE 401-403.		
1728	C19003	C19004	E-mail from Lorenz to Perez etc., dated Oct. 19, 1998, re: Parabe Response Letter, with attached Proposed response letter to concerned individuals who have contact Chevron	Perez	Cumulative of other evidence. Reference to protest letters is prejudicial. Draft letter is misleading. FRE 401-403		
1728	C33625	C33625	CNL A/P Voucher Journal Report, dated 2/3/99	Howard	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1729	C19961	C19965	Email from Lorenz to Perez, dated 10/19/98, re: RE: Nigeria conference call	Perez	Attached article is hearsay. FRE 802. Email exchange concerns media response to Ijaw situation so is irrelevant, misleading and prejudicial. FRE 401-403. Cumulative of other evidence including 1745. FRE 401-403		
1730	C20040	C20041	E-mail from Soper to Lavington etc., dated 11/19/98, re: Final Parabe Statement- Review	Perez	Attachment is irrelevant and misleading because it is a draft. FRE 401-403. Email to Perez is hearsay, irrelevant and misleading because Perez does not recall receiving the email. FRE 401-403		
1731	C19654	C19655	E-mail from Gorell to Derr etc., dated November 20, 1998, re: Nigeria letter to Editor letter	Perez	Irrelevant and misleading because Perez does not recall if the attached draft went to the Chronicle and she does not recall reviewing the draft letter before it went to the Chronicle. FRE 401-403		
1732	C20457	C20459	Email from Loo to Lavington, dated September 30, 1998, re: RE: Radio report on Chevron Nigeria	Perez	Various summaries of Pacifica radio interview are hearsay. FRE 802. Cumulative of 1503. FRE 401-403		
1733	C23796	C23798	Letter from Perez to O'Reilly etc., dated March 17, 1999, re: Chevron Nigerian Issues Team Proposal, REDACTED	Perez	Irrelevant and prejudicial. Limited probative value, if any, of investigations by HRW, Amnesty International, Project Underground, congressional investigation and shareholder proposal, etc., is far outweighed by possible prejudice. Impermissible reference to Opia/Ikenyan. To the extent there is any reference to Parabe it is cumulative of other evidence. FRE 401-403		
1734	C23797	C23797	E-mail from Perez to Caccamo etc., dated March 3, 1999, re: meeting with anti-Chevron in Nigeria coalition members	Perez	That there was a meeting with coalition members is irrelevant and prejudicial. The coalition addressed many topics that are irrelevant and prejudicial, including Opia/Ikenyan and the environment. FRE 401-403. Summary of coalition meeting is hearsay. FRE 802		
1735	C19922	C19924	Email from Lorenz to Lavington, dated 10/12/98, re: FW: Africare: (5a) release: Thoughts	Perez	Exchange about Africare Press Release is irrelevant, misleading and cumulative of other evidence. FRE 401-403. Statements from Jay Stuller are hearsay		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1736	C19989	C19996	Document entitled "Current African Issues, Nigeria Parabe Incident"	Perez	Cumulative and irrelevant (country description, tribal unrest, etc.) FRE 401-403. Hearsay. FRE 802		
1737	C17405	C17406	E-mail from Mackie to Perez etc., dated October 25, 1998, re: Nigeria/Parabe response II	Perez	Irrelevant because letter is an internal draft and cumulative. FRE 401-403. Handwritten notes are hearsay. FRE 802		
1738	C17407	C17409	Email from Lavington to Mackie etc., dated 11/2/98, re: FW: Nigeria/Parabe response III	Perez	Irrelevant because letter is an internal draft and cumulative. FRE 401-403		
1740	C20271	C20274	Email from Golon to Irwin and others re: Nigeria-Confidential, dated January 5, 1999	Perez	Information regarding fall 1998 ethnic crisis is irrelevant and misleading. FRE 401-403. Email from Omole and attachment are hearsay. FRE 802. Cumulative of other evidence including 315. FRE 401-403		
1741	C039396	C039396	Email from Schull to Kirkland and others re: Nigeria Current Status, dated January 19, 1999, REDACTED	Perez	Impermissible reference to Opia/Ikenyan. FRE 401-403. Alcanese protest is irrelevant and prejudicial. FRE 401-403. Handwritten notes are hearsay. FRE 802		
1742	C17340	C17341	Email from Perez to Irwin and others re: Africa Communications Strategy, dated January 6, 1999	Perez	Incomplete document. FRE 106. Irrelevant and misleading – email exchange does not concern Parabe, but relates to Africare, Ijaw crisis, etc. FRE 401-403		
1743	C19723	C19724	Email from Perez to Irwin and others re: Pacifica gets award for Democracy Now, dated March 10, 1999	Perez	Article regarding Polk Awards is hearsay. FRE 802. Irrelevant and prejudicial. FRE 401-403		
1744	C19568	C19570	Email from Lorenz to Libbey and others re: Nigeria/Reuters inquiry, dated October 8, 1998	Perez	Summaries of statements by Reuters reporter are hearsay. FRE 802. Information about Ijaw unrest is irrelevant and misleading. Information about environment is irrelevant and prejudicial and goes beyond the limits set by the Court's in limine order. To the extent the document contains information about Parabe it is cumulative of other evidence including 1019 & 223 & 1510. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1745	C19966	C19970	Email from Lorenz to Omole and others re: Nigeria conference call, dated October 19, 1998	Perez	Attached article is hearsay. FRE 802. Email exchange concerns media response to Ijaw situation so is irrelevant, misleading and prejudicial. FRE 401-403. Cumulative of other evidence including 1836. FRE 401-403		
1746	C19492	C19492	Email from Lorenz to Mackie re: Nigeria/Parabe, draft 6, dated November 10, 1998	Perez	Statements attributed to Deji Haastrup are hearsay. FRE 802. Incomplete document. FRE 106. Prejudicial and cumulative of other evidence including 236 & 1547. FRE 401-403		
1747	C19232	C19233	Email from Lorenz to Lavington, dated 2/25/1999, re: Barges, Boats & Helicopters	Perez	Misleading and prejudicial because response concerns boats, which relates to Opia/Ikenyan only. Irrelevant and cumulative. FRE 401-403		
1748	C19309	C19309	Email from Lorenz to Haastrup and others re: Nigeria: Encounter with German Journalist, dated March 4, 1999, REDACTED	Perez	Incomplete document. FRE 106. Prejudicial, misleading and irrelevant because reporter was researching Opia/Ikenyan and there are direct references to Opia/Ikenyan. Cumulative of other evidence including 1537 and 257. FRE 401-403		
1749	C19562	C19564	Email from Lorenz to Omole and others re: Nigeria QA, dated October 20, 1998	Perez	Incomplete document. FRE 106. Cumulative of other evidence including 231. Misleading and irrelevant references to pipeline explosion and environment. FRE 401-403		
1750	C23028	C23030	Email from Lorenz to Lavington re: Nigeria Award of Environmental Excellence, dated February 11, 1999	Perez	Email strong dated 2/99 re Environmental award is irrelevant, waste of time and prejudicial; hearsay. FRE 401-403, 802; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1751	C20399	C20400	Email from Omole to Kirkland and others re: Kucinich letter, dated February 25, 1999, REDACTED	Perez	Recount of meeting with Kucinich and statements made by Kucinich are hearsay as is Omole email. FRE 802. Evidence concerning congressional investigation and HRW report is highly prejudicial that outweighs any possible probative value. The investigation and report were only conducted after Opia/Ikenyan and there are many impermissible references to Opia/Ikenyan making the document misleading. Cumulative of other evidence including 325. FRE 401-403		
1752	C17487	C17494	Fax from Chevron Corporation Public Affairs to Lorenz re: We need your assistance with the attached, dated April 7, 1999, with attached letter from Walker to Gorell re: Stockholder Proposal On Code of Business Conduct, dated March 22, 1999, REDACTED	Perez	Stockholder proposal is hearsay. FRE 802. Prejudice of stockholder proposal and HRW report far exceeds any possible probative value. Irrelevant and misleading. Cumulative of other evidence FRE 401-403. Impermissible reference to Opia/Ikenyan. FRE 401-403.		
1801	C1647	C1655	Table of Commitment Authority, last updated August 30, 2000	Wells	2000 table of authority is irrelevant, too remote in time, unduly prejudicial and would mislead the jury. FRE 401-403.		
1820			Document entitled "Copyright 1996, IPS-Inter Press Service/Global Information Network	Golon	Articles are hearsay. FRE 802. Articles about the 1999 elections are irrelevant, prejudicial and misleading. FRE 401-403		
1821	C19790	C19791	Email from Lorenz to Omole and others re: DJN: Nigeria Pro-Democracy Group Wants Oil Embargo, dated June 9, 1998	Golon	Article is hearsay. FRE 802. Article about Abubakar irrelevant, misleading and prejudicial. FRE 401-403		
1822	C19788	C19789	Email from Lorenz to Omole re: Texaco Takes 'Wait and See' View After Nigeria Leader Death, dated June 9, 1998	Golon	Hearsay. FRE 802. Irrelevant and misleading. FRE 401-403		
1823			Los Angeles Times article titled "ENERGY" dated July 20, 1994	Golon	Hearsay. FRE 802. Irrelevant and misleading. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1824			IPS article titled "United States - Nigeria: Cities Lead The Way On Sanctions" by Rose Umoren dated May 15, 1996	Golon	Article is hearsay. FRE 802. Irrelevant, prejudicial and misleading. FRE 401-403		
1825	C19458	C20174	Collection of news highlights sent from CNL to various Chevron employees, such as Lorenz, in the 1998-1999 time period, REDACTED	Golon	Articles are hearsay. FRE 802. There is only one article that relates to Parabe (C19571) and it does not contain any statements by CNL or Chevron Corp. representatives. The other articles are irrelevant and misleading, and at times prejudicial (such as the article on C20174) concerning the congressional investigation or Opia/Ikenyan. FRE 401-403		
1825	C19458	C20174	Email from Lorenz to Sheldon and others re: News Highlights (Monday, December 14, 1998), dated December 15, 1998	Golon	Articles are hearsay. FRE 802. There is only one article that relates to Parabe (C19571) and it does not contain any statements by CNL or Chevron Corp. representatives. The other articles are irrelevant and misleading, and at times prejudicial (such as the article on C20174) concerning the congressional investigation or Opia/Ikenyan. FRE 401-403		
1827	C19832	C19833	Email from Lorenz to Omole and others re: Mobil, Texaco, Chevron Say Nigeria Output at normal levels, dated July 8, 1998	Golon	Article is hearsay. FRE 802. Articles concerning Abacha's death, which occurred after Parabe, are irrelevant, misleading and prejudicial. FRE 401-403		
1828	C19037	C19052	Email from Lorenz to Omole and others re: Democracy Now transcript, dated October 7, 1998	Golon	Entire interview is hearsay. FRE 802. Statements by Sola are irrelevant to plaintiffs' ratification theory because Sola is a CNL employee, not an employee of defendants. FRE 401-403. Cumulative of 222 & 1020 & 5392. FRE 401-403		
1829	C20449	C20451	Email from Haastrup to Anyigbo and others re: Nigeria: Parabe inquiry from Reuters, dated September 30, 1998	Golon	Summaries of statements by reporters are. FRE 802. Cumulative of other evidence including 1504. FRE 401-403. Deji's email re: Sola's comments during Pacifica interview is hearsay. FRE 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1830	C19919	C19920	Email from Lorenz to Irwin and others re: Africare Briefing Books, dated October 9, 1998	Golon	Cumulative of other evidence including 1512 & 282. FRE 401-403		
1831	C20079	C20080	Email from Lorenz to Lavington re: NIPR lecture, dated December 17, 1998	Golon	Hearsay. FRE 802. Irrelevant and misleading. FRE 401-403		
1832	C19374	C19375	Email from Lorenz to Omole and others re: Ilaje Village - Part 2, dated July 31, 1998	Golon	Hearsay. FRE 802. Not relevant to claims or defenses. FRE 401-403. Declarant lacks personal knowledge. FRE 602. Cumulative of other evidence including 206. FRE 401-403		
1833	C19413	C19416	Email from Lorenz to Omole and others re: Greenwash this, if you would, dated July 20, 1998	Golon	Note to ChevWeb is hearsay. FRE 802. Attachment is cumulative of other evidence including 194. FRE 401-403. Email exchange concerning note on ChevWeb is irrelevant and prejudicial. FRE 401-403		
1834	C19929	C19931	Email from Lorenz to Omole and others re: Wires: Nigeria, dated October 13, 1998	Golon	Articles are hearsay. FRE 802. Articles about 1998 Ijaw unrest and Shell activities are irrelevant and misleading. FRE 401-403		
1835	C29838	C29838	Fax from Perez to Lavington and others re: Front page article of today's SF Chronicle	Golon	With the exception of the quotes attributed to Tom Schull ("a very, very difficult situation," and "in the Niger Delta . . . government," and "machetes, clubs and knives.") the article is hearsay. FRE 802. Cumulative of other evidence. FRE 401-403		
1836	C19966	C19970	Email from Lorenz to Omole and others re: Nigeria conference call, dated October 19, 1998	Golon	Attached article is hearsay. FRE 802. Email exchange concerns media response to Ijaw situation so is irrelevant, misleading and prejudicial. FRE 401-403. Cumulative of other evidence including 1745. FRE 401-403		
1837	C19340	C19342	Email from Lorenz to Irwin etc., dated 2/4/99, re: RE: Media Response to Hart Europe (re: Nigeria)	Golon	This exhibit is cumulative of Exhibit 1568. FRE 401-403. Email exchange is misleading and prejudicial because it concerns media inquiries about Opia/Ikenyan. FRE 401-403		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1839	C19026	C19144	Email from Lorenz to Hayden etc., dated 2/24/99, re: FW: Reuters rewrite, including Reuters article entitled, "US Congress asked to investigate Chevron's role in Nigeria"	Golon	Reuters article is hearsay. FRE 802. Documents concerning congressional investigation and HRW report are prejudicial and misleading. FRE 401-403. Impermissible references to Opia/Ikenyan that is irrelevant, prejudicial and misleading. FRE 401-403 Cumulative of other documents. FRE 401-403		
1840	C19232	C19233	Email from Lorenz to Lavington, dated 2/25/1999, re: Barges, Boats & Helicopters	Golon	February 1999 email regarding use and ownership of helicopters is speculative, irrelevant, unduly prejudicial and an attempt to back door Opia and Ikenyan evidence. FRE 401-403, 602, 802.		
1850	C19272	C19273	Email from Lorenz to Houghton, dated 2/23/99, re: RE: Shut in Production-Swamp	Chow	February 1999 email regarding production shut-in is speculative, irrelevant, unduly prejudicial and an attempt to back door Opia and Ikenyan evidence. FRE 401-403, 602, 802.		
1851	C20403	C20403	E-mail from Connor to Neyin etc., dated 12/22/98, re: RE: Visit to Escravos Gas Plant Offshore Compression Station and FSO	Chow	December 1998 visit to Escravos Gas Plant is irrelevant, remote in time, unduly prejudicial and would confuse the jury. FRE 401-403.		
1852	C27554	C27555	Email from Chow to Bates etc., dated 11/26/98, re: Tsekelewu Community	Chow	November 1998 email re: Opuekeba and dredging is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
1853	C27556	C0944	Email from Chow to Fitzmorris etc., dated 11/19/98, re: Opuekeba Simulation & Well Plan	Chow	November 1998 email re: Opuekeba and dredging is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
1854	C27529	C27531	Email from Adekunle to Chow etc., dated 12/29/98, re: RE: Opuekeba Campaign Schedule (Update)	Chow	December 1998 email re: Opuekeba and dredging is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
1855	C044111	C044113	Email from Uwaka to Neku, dated 8/18/98, re: FW: Abigborodo West B & C	Chow	August 1998 email regarding boat theft by Ijaws and need for dredging is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
1856	C2196	C2201	Letter from Davis to Brown etc., dated October 8, 1997, re: Supplement to work requisition #G-152642 Core Characterization - COPI Stratigraphic Services	Chow	1997 letter re: appropriation request for Ewan Field is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
1857	C2317	C2319	Letter from Davis to Brown etc., dated March 27, 1997, re: GO-113s w/ attached work requisition form	Chow	1997 letter re: appropriation request for Ewan Field is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
1858	C2183	C2185	Letter from Davis to Brown etc., dated November 5, 1997, re: Supplement to work requisition #G-152636 Opuekeba CD-01 Reservoir Simulation Study - San Ramon, w/ attached work requisitions forms	Chow	1997 letter re: appropriation request for Ewan Field is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
1859	C20296	C20296	Email from Lawal to Omatayo etc., dated 7/23/98, re: RE: AMD Managers' Meeting	Chow	July 1998 email re: Ilaje violence is irrelevant and would confuse the jury. FRE 401-403.		
1860	C25296	C25296	Chart, Asset Management Department, Reservoir Management Division	Chow	1999 Organization chart for Asset Management Department is irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
1861	C0972	C0999	Appropriation Request, Summary- Part 1	Chow	1996 appropriation request for Ewan Field is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
1862	C3010.16	C3010.16	U.S. \$ Employees In Nigeria - 1999	Chow	1999 list of employees in Nigeria is irrelevant, would mislead the jury and cause undue delay. FRE 401-403.		
1863	C5468	C5468	Foreign Payroll Billing, Pay Period 06/30/97 Five Digit Organization Code Summary	Chow	1997 summary of individuals' pay is irrelevant, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
2000			"Declaration of Custodian of Records" dated November 22, 2005, with a nine-page CV of Dr. Alamin	Alamin	FRE 403, 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
2002			"Declaration of Custodian of Records" dated November 16, 2005, with a 52-page attachment begin hospital records (Bowoto medical records)	Alamin	FRE 403, 802		
2003			Medical chart with a procedure date of January 15, 2003 described as a transcribed report from Stanford Hospital for Larry Bowoto	Alamin	FRE 403, 802		
2004			Operation Report dated January 15, 2003, for Larry Bowoto	Alamin	FRE 403, 802		
2005			Medical chart, dated January 6, 2003, described as a transcribed report from Stanford Hospital for Larry Bowoto	Alamin	FRE 403, 802		
2006			Medical chart w/ a procedure date of January 27, 2003 described as a transcribed report from Stanford Hospital for Larry Bowoto	Alamin	FRE 802		
2008	B07970	B07990	Copy of a 21-page curriculum vitae of Margot Beth Kushel, M.D.	Kushel	FRE 401, 403		
2009			Outpatient Progress Record, San Francisco General Hospital, dated December 17, 2002 (Bowoto medical records)	Kushel	FRE 403, 802		
2010			Outpatient Progress Record, San Francisco General Hospital, dated December 24, 2002 (Bowoto medical records)	Kushel	FRE 403, 802		
2011			Declaration of Custodian of Records, dated November 15, 2005, with a 40-page attachment of medical records SF Gen 1-40 (Bowoto medical records)	Kushel	FRE 403, 802		
2012	B00165	B00167	Outpatient Consultation Requests to Trauma Clinic (re Bowoto)	Kushel	FRE 403, 802		
2015	B08008	B08014	Email from Oksenberg to Kushel, dated 12/10/02, re: Larry Bowoto	Kushel	FRE 403, 802, 901		
2016	B1464	B1512	49-page report, the first page stamped "Eku Baptist Hospital Front Sheet," dated 6/28/98 (Bowoto medical records)	Kushel	Partial dupe of 1617 (Adesina). FRE 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
2500	C34269	C34375	Slides beginning with a page entitled "Asset Classification" and at the bottom left-hand corner the phrases "CPDEP/UADP Workshop"	Hagstrom	Exhibit is duplicative of 5195. FRE 403. Document on CPDEP / UADP as applied to exploration has no relevance, would mislead the jury and would cause undue delay. FRE 401-403.		
2501	C31411	C31415	1998 to 2000 COPI Business Plan: Delivering Results Through Execution and Learning	Hagstrom	COPI 1996 Business Plan regarding development and exploration projects is irrelevant, speculative, too remote in time, would confuse the jury and cause undue delay. FRE 401-403, 602. Duplicative of 5097. FRE 403.		
2502	C1077	C1099	Letter from Kirkland to Matzke, dated August 28, 1997, re: Escravos Gas Project Phase 2 Appropriation Request Approval	Hagstrom	1997 letter re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2503	C34376	C34458	Slides entitled "Chevron Project Development and Execution Project workshop" dated 1999	Hagstrom	Exhibit is duplicative of 5185. FRE 403. A PowerPoint for a 1999 Workshop on CPDEP has no relevance, would mislead the jury and cause undue delay. FRE 401-403.		
2504	C1013	C1052	Memo from Derr to Matzke etc., dated December 19, 1996, re: appropriation request	Hagstrom	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2505	C2080	C2097	Work Orders, dated 9/25/00	Hagstrom	2000 work requests are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2506	C2129	C2129	Memo from Koelmel to Brown, dated 3/23/96, re: GO-113 Nigeria Sub San Ramon- Opuekeba Field Study Phase 1	Hagstrom	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2507	C2152	C2152	Work Requisition #152619, dated 7/1/96	Hagstrom	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2508	C2124	C2128	Work Requisition #08890, dated 12/22/93	Hagstrom	1993 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
2509	C2657	C2657	Work Requisition #121618, dated 5/19/2000	Hagstrom	2000 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2510	C2130	C2130	Work Requisition #152603, dated 3/22/1996	Hagstrom	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2511	C2131	C2131	Work Requisition #152604, dated 3/22/1996	Hagstrom	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2512	C2220	C2220	Work Requisition #228336 and #228335, dated 3/20/1996	Hagstrom	1996 work requests are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2513	C2222	C2224	Work Requisitions, dated 3/29/1996	Hagstrom	1996 work requests are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2514	C2225	C2225	Work Requisitions, dated 7/19/1996	Hagstrom	1996 work requests are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2515	C2226	C2226	Work Requisitions, dated 11/18/96 & 9/12/96	Hagstrom	1996 work requests are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2516	C2227	C2227	Work Requisitions, dated 11/21/96 & 7/16/95	Hagstrom	1996 and 1995 work requests are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2517	C2228	C2228	Work Requisitions, dated 7/21/93 & 7/19/93	Hagstrom	1993 work requests are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
2518	C2229	C2229	Work Requisitions, dated 7/21/93	Hagstrom	1993 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2519	C2230	C2230	Work Requisitions, dated 8/5/93 & 9/29/93	Hagstrom	1993 work requests are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2520	C2231	C2231	Work Requisitions, dated 10/11/93 & 9/29/93	Hagstrom	1993 work requests are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2521	C2232	C2232	Work Requisitions, dated 10/14/93	Hagstrom	1993 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2522	C2136	C2136	Work requisitions, dated 4/16/96	Hagstrom	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2523	C2139	C2140	Memo from Koelmel to Brown, dated 5/16/96, re: GO-113- COPI San Ramon-Gbokoda Field Reservoir Mapping, w/ attached work requisition	Hagstrom	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2524	C2141	C2142	Memo from Koelmel to Brown etc., dated 6/11/96, re: Work Requisition #G-152614, Sand Control Technical Assistance, w/ attached work requisition	Hagstrom	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2525	C2144	C2145	Memo from Koelmel to Brown etc., dated 6/14/96, re: GO-113 COPI San Ramon-Opuekeba Field Study Phase 2, w/ attached work requisition	Hagstrom	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2526	C2169	C2170	Letter from Koelmel to Brown etc., dated 8/29/96, re: Work Requisition- Senior Production Engineer, Escravos, w/ attached work requisition	Hagstrom	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
2527	C2190	C2192	Memo from Koelmel to Brown, dated 11/20/96, re: San Ramon staff	Hagstrom	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
2700			Dr. W.O. Ajewole; Curriculum Vitae	Ajewole	Hearsay. FRE 802.		
2701			Bachelor of Medicine and Bachelor of Surgery Diploma from University of Ibadan for Williams Ajewole, dated 7/6/79	Ajewole	Hearsay. FRE 802.		
2702			Certificate of Full Registration as a Medical Practitioner, Williams Ajewole, dated 6/12/80	Ajewole	Hearsay. FRE 802.		
2703			Society of Apothecaries of London Diplomat in Medical Jurisprudence for Williams Ajewole, dated 1/7/93	Ajewole	Hearsay. FRE 802.		
2704			Letter from Lawani to Commissioner for Health, Ondo State, dated 9/7/90, re: Letter of Appreciation	Ajewole	FRE 401, 403, 802		
2705			Letter from Bunza to Ajewole, dated 12/30/99, re: Letter of Appreciation	Ajewole	FRE 401, 403, 802		
2706	B1549	B1551	Autopsy Reports of Arolika Irowarinun and Jolly Adehin, dated 6/25/98	Ajewole	Dupe of 1615 (Laibi). FRE 403, 702, 802		
2707	B1548	B1546	Letter from Dr. Ajewole to Oriabure, dated 9/5/05, re: Arodileka Omoseibe	Ajewole	FRE 403, 702, 802		
2708			Copy of a page from Visitor's Notebook, Necropsy Record	Ajewole			
2709			Report of Medical Practitioner for Arodileka Omoseibe	Ajewole	FRE 403, 702, 802		
2710			Report of Medical Practitioner for Jolly Adehin	Ajewole	FRE 403, 702, 802		
2711			Dr. Ajewole's sketch of corpse of Arodileka Omoseibe	Ajewole			
2712			Dr. Ajewole's sketch of corpse of Jolly Adehin	Ajewole			
2713	C25013	C25023	Series of photographs taken May 28, 1998 of corpse, Escravos Heliport	Ajewole	FRE 401, 403		
2714			Excerpt from The New Police Surgeon on Injuries due to Gunshot Wounds, Explosives and Fire	Ajewole	FRE 401, 403, 802		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
2715	C045069	C045070	Correspondence from Matzke to Derr, dated 4/25/97, re: COPI Activity Report	Pryor	Exhibit is incomplete. FRE 106. Memo regarding distribution of report is irrelevant, would mislead the jury and is not evidence of specific agency. FRE 401-403.		
2716	C038735	C038738	Expatriate HR Policy Study 1997/1998, dated 7/9/98	Pryor	July 1998 Survey is irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
2717	C1656	C1658	Chevron Policy Manual, Policy 209, Human Resources-Employment, date effective 4/1/94	Pryor	Exhibit is incomplete and does not include all human resources policies. FRE 106. 1994 policy is too remote in time, is irrelevant and is not evidence of specific agency. FRE 401-403.		
2718	C3225	C3225	On Temporary International Assignment, Types and Duration of International Assignments	Pryor	2001 policy is irrelevant, too remote in time and not evidence of specific agency. FRE 401-403.		
2719	C038929	C038930	Email from Stuart to Garrett etc., dated 6/19/97, re: Transition Issues- New ICE Benefits	Pryor	1997 email regarding ICE is irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
2720	C038392	C038392	Expatriate Policy Study Process Team Members	Pryor	1997 email regarding ongoing study is irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
2721	C038379	C038382	PowerPoint presentation dated 1/15/97 re: Expatriate Policy Study	Pryor	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
2722	C2994	C3010.23	U.S. \$ Employees in Nigeria - date range 1996-2000	Pryor	1996-2000 list of employees in Nigeria is irrelevant, would mislead the jury and cause undue delay. FRE 401-403.		
2723	C22480	C22480	Personnel Announcement from Kirkland to All Employees, dated March 20, 1998	Pryor	Job announcement in March 1998 is irrelevant and would cause undue delay. FRE 401-403.		
2724	C038991	C038993	Program for Expatriate Study Awards Ceremony, April 1, 1998, Scott's Seafood Bar & Grill, Walnut Creek, CA	Pryor	Awards program is irrelevant, would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
2725	C25201	C25202	Announcement from Pryor to Expatriate Rotational Employees, dated 12/7/98, re: Rotational Location Premiums, Expatriate Rotational Employees	Pryor	December 1998 rotational premiums are irrelevant, remote in time, would confuse the jury and are not evidence of specific agency. FRE 401-403.		
2726	C26777	C26778	Memo to multiple people from Newville, dated 12/11/98, re: Emergency Contact Information	Pryor	December 1998 memo re: emergency contact information is irrelevant, remote in time, unduly prejudicial and would confuse the jury. FRE 401-403.		
2727	C25135	C25135	Letter from Pryor to Cagle, dated 4/22/99, re: Letter of commendation	Pryor	Dupe of 412 (Connor). FRE 401, 403, 802		
2730			Notice of Deposition of Defendant ChevronTexaco Overseas Petroleum and Request to Produce Documents Pursuant to FRCP 30(b)(6) (Phase II), dated 7/1/05	Adekunle	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
2732	C074469	C074473	CNL Spills - North Offshore Area (NOA) and N. Onshore Facilities 1996-2000	Adekunle	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
2732	C074469	C074473	Weekly Project Reports	Adekunle	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210. Dupe of 5723		
2733	C074220	C074220	Dredging Costs (1995 to 1996)	Adekunle	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
2734	C074221	C074221	Location Name (Duration of Dredging), dated range Dec 1996-March 1998	Adekunle	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
2735	C074769	C074891	Final Report of the Environmental Impact Assessment for the Benin Field Development Project, dated March 1996	Adekunle	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210. Partial dupe of 5662		
2736			List of Page Numbers - Mr. Adekunle agreed that the information stated on these pages was correct	Adekunle	Environmental evidence is irrelevant, waste of time and prejudicial; hearsay. FRE 401-403, 802; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
4000	BOB0460	BOB0464	Letter from Cunningham to Babalakin etc., dated 12/23/05, re: Larry Bowoto, et al. v. Chevron Corp...	Babalakin	Waste of time, undue delay. FRE 403.		
4001	BOB0457	BOB0459	E-mail from Oyefuga to Cunningham etc., dated 1/12/06, re: Signature pages-retainer & protective order	Babalakin	Waste of time, undue delay. FRE 403.		
4002	BOB0335	BOB0337	E-mail from Oyefuga to Ademakinwa etc., dated 12/13/05, re: RE: Bowoto, et al. v Chevron, et al.	Babalakin	Waste of time, undue delay. FRE 403.		
4003	BOB0332	BOB0334	E-mail from Oyefuga to Cunningham etc., dated 1/13/06, re: Retainer Issue	Babalakin	Waste of time, undue delay. FRE 403.		
4005	BOB0426	BOB0427	Letter from Babalakin to Mitchell, dated 1/13/06, re: Larry Bowoto, et al v. Chevron Corp, with bill attached	Babalakin	Waste of time, undue delay. FRE 403.		
4006	BOB0331	BOB0331	E-mail from Oyefuga to Cunningham etc., dated 12/19/05, re: Bowoto, et al. v. Chevron, et al.	Babalakin	Waste of time, undue delay. FRE 403.		
4007	BOB0453	BOB0454	E-mail from Babalakin to Oyefuga, dated 12/14/05, re: chevron, REDACTED	Babalakin	Waste of time, undue delay. FRE 403.		
4008			Expert Report of Dr. Bolanle Olawale Babalakin, SAN, dated 1/8/06	Babalakin	Waste of time, undue delay. FRE 403.		
4009	BOB0342	BOB0343	E-mail from Oyefuga to Cunningham etc., dated 12/12/05, re: Bowoto, et al., v. Chevron, et al.	Babalakin	Waste of time, undue delay. FRE 403.		
4010			Nigerian Monthly Law Reports, Prince Edison Eweka v. Midwest Newspaper Corporation	Babalakin	Waste of time, undue delay. FRE 403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
4011	C118794	C118796	E-mail from Ademakinwa to Babalakin etc., dated 12/7/05, re: Bowoto, et al. v. Chevron, et al. Materials for Review	Babalakin	Waste of time, undue delay. FRE 403.		
4012	BOB0219	BOB0220	Memo from FO to BOB, dated 12/23/05, re: Bowoto et al v. Chevron Corp, et al.-Issues for Inclusion in Expert Opinion	Babalakin	Waste of time, undue delay. FRE 403.		
4013	BOB0221	BOB0240	Memo from SA/ATF to BOB/FILE, dated 12/21/05, re: Brief Summary of Facts of the Case	Babalakin	Waste of time, undue delay. FRE 403.		
4015	JOO0074	JOO0080	Initial Expert Report of Professor John Oladapo Obafunwa, dated 1/2/06	Obafunwa	Waste of time. FRE 403.		
4016	C118414	C118423	Reformatted Expert Report of Professor John Oladapo Obafunwa, dated 1/2/06	Obafunwa	Waste of time. FRE 403.		
4017	C118401	C118411	Final Expert Report of Professor John Oladapo Obafunwa, dated 1/2/06	Obafunwa			
4040	C049040	C049041	Retention of Electronic Records, New U.S. Internal Revenue Service Requirements	Wilcox	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. <i>See Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); <i>see also Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
4041	C0455	C0457	Email from Loo to Wilcox etc., dated 5/29/98 3:29pm, re: FW: Parabe RHM Memo	Wilcox	Irrelevant because exhibit is internal document and cumulative of other evidence including 133. FRE 401-403		
4042	C0410	C0410	Email from Schull to Loo etc., dated 6/1/98, re: Parabe Platform Incident-Situation Update	Wilcox	Correspondence by CNL employee is hearsay. FRE 802. Cumulative of other evidence including 159. FRE 401-403		
4043	C036001	C036003	Email from Warner to Derr, dated 10/1/98, re: Nigeria	Wilcox	Letters and emails are hearsay. FRE 802. Irrelevant, misleading and prejudicial. FRE 401-403		
4044	C036000	C036000	Note from Santos to Joe, w/ handwritten notes, dated 10/21/98, re: coordinating responses to write-ins	Wilcox	Irrelevant. FRE 401-403. Hearsay. FRE 802		
4045	C035998	C035999	Email from Wilcox to Lavington etc., dated 11/11/98, re: FW: Nigeria/Parabe draft 7	Wilcox	Draft letter is irrelevant and misleading. Cumulative of other evidence. FRE 401-403		
4046	C049736	C049820	Security Department Standard Operating Instructions Daily Security Routines, dated 9/1/99	Wilcox	Security SOPs effective Sept. 1999 are irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407.		
4047	C13421	C13443	Corporate Security Review at Escravos, March 15-16, 2000	Wilcox	Security review dated March 2000 is irrelevant, waste of time and subsequent remedial measures cannot be used to show liability. FRE 401-403, 407.		
4048	C13328	C13328	Agreement between Wilcox and Castagna, dated 4/11/01, re: Renewal of Co-Operation Agreement and Purchase/Sales Contracts	Wilcox	2001 agreements re: crude sales are irrelevant, too remote in time, unduly prejudicial and would mislead the jury. FRE 401-403.		
4049	C23457	C23457	Letter from Carlton to Wilcox, dated 4/11/01, re: Job Offer- Mr. Scott E Davis	Wilcox	2001 letter re: job offer is irrelevant, prejudicial and would mislead the jury. FRE 401-403.		
4050	C23523	C049820	Email from Jennings to Wilcox and others re: Nigeria SUB Missing Persons, dated April 19, 1999	Wilcox	Email string dated 4/19/99 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
4050	C23523	C049820	Chevron Nigeria Limited CNL Standard Operating Procedure (SOP) Incident Procedures SOP-XXX, dated September 1, 1999	Wilcox	Email string dated 4/99 is irrelevant, waste of time. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
GL02			Blueprint of floor layout	Glassner	Confusing, waste of time; plaintiffs have not identified Glassner as a trial witness and this exhibit is incomprehensible without explanation. FRE 401-403.		
GL03	B11935	B11944	CV for Dr. Andrew S. Glassner, dated 3/9/05	Glassner	Hearsay, irrelevant, waste of time; plaintiffs have not identified Glassner as a trial witness. FRE 401-403.		
GL06			Two photos	Glassner	Confusing, waste of time; plaintiffs have not identified Glassner as a trial witness and this exhibit is incomprehensible without explanation. FRE 401-403.		
GL07	GL02	GL03	Two diagrams of field of view	Glassner	Confusing, waste of time; plaintiffs have not identified Glassner as a trial witness and this exhibit is incomprehensible without explanation. FRE 401-403.		
GL08			Two photos	Glassner	Confusing, waste of time; plaintiffs have not identified Glassner as a trial witness and this exhibit is incomprehensible without explanation. FRE 401-403.		
GL09			Two photos	Glassner	Confusing, waste of time; plaintiffs have not identified Glassner as a trial witness and this exhibit is incomprehensible without explanation. FRE 401-403.		
GL10			Two photos	Glassner	Confusing, waste of time; plaintiffs have not identified Glassner as a trial witness and this exhibit is incomprehensible without explanation. FRE 401-403.		
GL11			Two photos	Glassner	Confusing, waste of time; plaintiffs have not identified Glassner as a trial witness and this exhibit is incomprehensible without explanation. FRE 401-403.		
GL13	B11118	B11108	Deposition of Gary Freed	Glassner	Confusing, waste of time; plaintiffs have not identified Glassner as a trial witness and this exhibit is incomprehensible without explanation. FRE 401-403.		
GL14	B11046	B11048	Deposition of Ebert, page numbers consistent with final transcript	Glassner	Confusing, waste of time; plaintiffs have not identified Glassner as a trial witness and this exhibit is incomprehensible without explanation. FRE 401-403.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
VZ01	C117717	C117820	Email from Kollios to Van Zandt, dated 1/26/06, re: Bowoto	Van Zandt			
VZ02	CVZ_0001	CVZ_010 5	Equivocal Death Investigation Analysis RE: Mr. Tyson Lane Davis	Van Zandt			
VZ03			Expert Report of Clinton R. Van Zandt, dated 1/9/06	Van Zandt			
VZ04			Handwritten notes	Van Zandt			
VZ05			Email from Ritchey to Van Zandt, dated 11/15/05, re: FW: Bowoto v. Chevron	Van Zandt	Irrelevant, waste of time. FRE 401-403.		
VZ06			Handwritten notes	Van Zandt			
VZ07			Deposition Exhibit (Retained by Counsel)	Van Zandt	No such exhibit exists; if it does, then plaintiffs have not provided a copy of that exhibit to defendants and defendants reserve all objections to the exhibit.		
VZ08			Email from Ritchey to Clint, dated 11/3/05, re: threatlink.com- Inquiry from Katherine Ritchey	Van Zandt			
VZ09			Deposition Exhibit (Retained by Counsel)	Van Zandt	No such exhibit exists; if it does, then plaintiffs have not provided a copy of that exhibit to defendants and defendants reserve all objections to the exhibit.		
VZ10			Deposition Exhibit (Retained by Counsel)	Van Zandt	No such exhibit exists; if it does, then plaintiffs have not provided a copy of that exhibit to defendants and defendants reserve all objections to the exhibit.		
VZ11			Deposition Exhibit (Retained by Counsel)	Van Zandt	No such exhibit exists; if it does, then plaintiffs have not provided a copy of that exhibit to defendants and defendants reserve all objections to the exhibit.		
VZ12			Deposition Exhibit (Retained by Counsel)	Van Zandt	No such exhibit exists; if it does, then plaintiffs have not provided a copy of that exhibit to defendants and defendants reserve all objections to the exhibit.		
VZ13			Deposition Exhibit (Retained by Counsel)	Van Zandt	No such exhibit exists; if it does, then plaintiffs have not provided a copy of that exhibit to defendants and defendants reserve all objections to the exhibit.		

PLAINTIFFS' DEPOSITION EXHIBITS							
Ex. #	Beginning Bates	Ending Bates	Description	Sponsoring Witness	Objection	Admitted or Not Admitted	Date Admitted
VZ14			Deposition Exhibit (Retained by Counsel)	Van Zandt	No such exhibit exists; if it does, then plaintiffs have not provided a copy of that exhibit to defendants and defendants reserve all objections to the exhibit.		
VZ15			Deposition Exhibit (Retained by Counsel)	Van Zandt	No such exhibit exists; if it does, then plaintiffs have not provided a copy of that exhibit to defendants and defendants reserve all objections to the exhibit.		
VZ16			Deposition Exhibit (Retained by Counsel)	Van Zandt	No such exhibit exists; if it does, then plaintiffs have not provided a copy of that exhibit to defendants and defendants reserve all objections to the exhibit.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5000	C1578	C1701	The Chevron Way - Chevron's Policy Manual	2000 Policy Manual is irrelevant, too remote in time and is not evidence of specific agency. FRE 401-403.		
5001	C1582	C1585	Chevron Policy Manual Policy 2, Management Procedures and Guidelines	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5002	C1591	C1592	Chevron Policy Manual Policy 50, Crisis Management	December 1999 policy is irrelevant, too remote in time and would mislead the jury. FRE 401-403, 407.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5003	C1603	C1606	Chevron Policy Manual, Policy 120, Financial- Appropriations	1999 policy on financial controls is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5004	C1607	C1610	Chevron Policy Manual Policy 130, Financial Controls, Internal Controls	1995 policy on financial controls is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5005	C1611	C1613	Chevron Policy Manual Policy 132, Financial Controls, Approval of Expenditures and Payment of Funds	1995 policy on financial controls is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5006	C1614	C1618	Chevron Policy Manual, Policy 134, Financial Controls, Auditing	1987 policy on financial controls is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5007	C1621	C1646	Chevron Policy Manual, Policy 190, Delegation of Authority	Exhibit is incomplete and should include C01621-1655. FRE 106. 1999 policy is too remote in time. FRE 401-403.		
5008	C1656	C1658	Chevron Policy Manual Policy 209, Human Resources - Employment, Foreign Service (Expatriate)	Exhibit is incomplete and does not include all human resources policies. FRE 106. 1994 policy is too remote in time, is irrelevant and is not evidence of specific agency. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5009	C1664	C1665	Chevron Policy Manual Policy 322, External Relations Political Contributions	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. <i>See, e.g.</i> , 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5010	C1666	C1667	Chevron Policy Manual Policy 324, External Relations, Payments to Government Officials	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		
5011	C1668	C1670	Chevron Policy Manual Policy 400, Legal Matters	Exhibit is incomplete and does not include all related policies. FRE 106. 1987 policy is too remote in time, is irrelevant and is not evidence of specific agency. FRE 401-403.		
5012	C1671	C1678	Chevron Policy 500 - Contracting	Exhibit is incomplete and does not include all related policies. FRE 106. 1997 policy is too remote in time, is irrelevant and is not evidence of specific agency. FRE 401-403.		
5013	C1682	C1684	Chevron Policy Manual, Policy 570, Operating - Security: Security of Personnel and Assets			
5014	C1700	C1701	Chevron Policy Manual Policy 580 - Purchasing	Exhibit is incomplete and does not include all related policies. FRE 106. 1993 policy is too remote in time, is irrelevant and is not evidence of specific agency. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5015	C3322	C3344	Expatriate H.R. Manual, re: Emergencies, Expatriate Vacations, Compensation - Tax Equalization, dated 11/2/1997	1994 manual is irrelevant, remote in time, would confuse the jury and is not evidence of specific agency. FRE 401-403.		
5016	C17594	C17684	Chevron Corporation Law Department Manual of Compliance Procedures and Guidelines, dated March 2001	2001 Manual of Compliance procedures is too remote in time, irrelevant, unduly prejudicial and would mislead the jury. It is not evidence of specific agency. FRE 401-403. Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See Sonora Diamond Corp. v. Super. Ct., 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); U.S. v. Bestfoods, 524 U.S. 51, 71-72 (1998); see also Calvert v. Huckins, 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp. [and] the adoption of internal accounting controls governing payments to foreign officials").		
5017	C13432	C13436	Policy list of problems with suggested improvements and the progress on said improvements.	1999 Security Review plan is irrelevant, too remote in time, unduly prejudicial and would confuse the jury. FRE 401-403, 407.		
5018	CS009080	CS009090	ChevronTexaco Security Services Division Standard Operating Procedures Escravos Operations Area, effective 6/1/2004	2004 Operating procedures are irrelevant, too remote in time, unduly prejudicial and would confuse the jury. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5019	C1315	C1348	Memo from Harkins (Delaware Sec of State), dated 12/19/88, re: hereby certify the attached in a true and correct copy..., w/ multiple certificates attached			
5020	C1349	C1394	Memo from Weir to Soler, dated 6/5/89, re: Chevron Alpha Company, w/ multiple certificates attached	1989 exhibit is irrelevant, confusing and too remote in time. FRE 401-403.		
5021			Excerpt from Chevron Corp's Form 10-K annual report filed with the SEC, for the fiscal year ending 12/31/93	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5022			Excerpt from Chevron Corp's Form 10-Q quarterly report filed with the SEC, for the period ending 3/31/94	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5023			Excerpt from Chevron Corp's Form 10-Q quarterly report filed with the SEC, for the period ending 6/30/94	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5024	C0532	C0559	Document entitled, "Restated Certificate of Incorporation, dated 8/2/94, including By-Laws of Chevron Corporation	1994 exhibit is too remote in time. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5025			Excerpt from Chevron Corp's Form 10-Q quarterly report filed with the SEC, for the period ending 9/30/94	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5026			Excerpt from Chevron Corp's Form 10-K annual report filed with the SEC, for the fiscal year ending 12/31/94	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5027			Excerpt from Chevron Corp's Form 8-K report filed with the SEC, dated 3/10/95	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5028			Excerpt from Chevron Corp's Form 10-K annual report filed with the SEC, for the fiscal year ending 12/31/95	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5029	C0815	C0826	Excerpt from Chevron Corporation 1996 Annual Report re: A Great Year for Chevron, Dimensions of Growth, Production Records Set, Employees Make a difference, and Chevron's World Wide Plans such as exploration and production growth in international areas.	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5030	C20518	C20531	Document entitled, "California (Nigeria), Incorporated, By-Laws, Amended 11/7/96"			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5031	C0825	C0825	Chevron Corporation 1996 Annual Report re: Growth through knowledge management, growth through technology and growth through flexibility	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5032	C0822	C0822	Chevron Corporation 1996 Annual Report, Chevron at a Glance re: Exploration and Production, Refining, Marketing, Supply and Distribution, Chemicals, Coal with areas of operation and competitive advantages	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5033			Excerpt from Chevron Corp's Form 10-K annual report filed with the SEC, for the fiscal year ending 12/31/96	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5034	C1058	C1069	Resolutions of the Executive Committee of Chevron Corporation June 24, 1997 re: Authorized Officers are allowed to execute and deliver on behalf of this corporation a guaranty agreement from this Corporation to Citibank in connection with an overdraft facility to be entered into by CNL in connection with the U.S. Dollar Joint Venture Bank Account.	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5035	C0801	C0801	Chevron Corporation 1997 Annual Report re: Quarterly Results and Stock Market Data over 1996 and 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5036	C0778	C0782	Chevron Corporation 1997 Annual Report re: Management's Discussion and Analysis of Financial Condition and Results of Operations	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5037			Excerpt from Chevron Corp's Form 10-K annual report filed with the SEC, for the fiscal year ending 12/31/97	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5038	C0719	C0719	Chevron Corporation 1998 Annual Report Notes to Consolidated Financial Statements	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5039	C24188	C24231	Report entitled, "Chevron's Business Conduct," Copyright 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5040	C24286	C24328	Report entitled, "Chevron's Business Conduct," Copyright 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. Bowoto, 312 F. Supp. 2d at 1240 (quoting Phoenix Canada Oil Co. v. Texaco, Inc., 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See Sonora Diamond Corp. v. Super. Ct., 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); U.S. v. Bestfoods, 524 U.S. 51, 71-72 (1998); see also Calvert v. Huckins, 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5041			Excerpt from Chevron Corp's Form 8-K report filed with the SEC, dated 1/29/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5042			Excerpt from Chevron Corp's Form 10-Q quarterly report filed with the SEC, for the period ending 3/31/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5043			Notice of Annual Meeting of Stockholders and Proxy Statement, dated 4/29/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5044			Excerpt from Chevron Corp's Form 10-Q quarterly report filed with the SEC, for the period ending 6/30/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5045			Excerpt from Chevron Corp's Form 10-Q quarterly report filed with the SEC, for the period ending 9/30/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5046			Excerpt from Chevron Corp's Form 10-Q quarterly report filed with the SEC, for the period ending 9/30/1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5047	C0496	C0513	Document entitled, "Restated Certificate of Incorporation, dated 11/23/98, signed by Derr and Beebe"	Exhibit is irrelevant, unduly prejudicial and misleading due to corporate reformation in late 1998 and is too remote in time. FRE 401-403.		
5048	C0514	C0531	Document entitled, "Restated Certificate of Incorporation, By Laws as Amended," dated 11/23/98	Exhibit is irrelevant, unduly prejudicial and misleading due to corporate reformation in late 1998 and is too remote in time. FRE 401-403.		
5049	C1395	C1446	Document entitled, "Certificate of Incorporation, Chevron Petroleum Limited," dated 12/1/98	Exhibit is irrelevant, unduly prejudicial and misleading due to corporate reformation in late 1998 and is too remote in time. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5050	C0680	C0703	Chevron Corporation 1998 Annual Report re: To Our Stockholders, staying focused...pursuing opportunities...shaping the future, hardships in 1998, Management's discussion and analysis of financial condition and results of operations	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5051	C0742	C0811	Photos and bios of Chevron Board of Directors for 1997 and 1998	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5052			Excerpt from Chevron Corp's Form 10-K annual report filed with the SEC, for the fiscal year ending 12/31/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5053	C0714	C0714	Chevron Corporation 1998 Annual Report, from Derr, Klitten and Crowe, dated 3/4/1999, re: Quarterly Results and Stock Market Data, Report of Management	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5054			Excerpt from Chevron Corp's Form 10-Q quarterly report filed with the SEC, for the period ending 3/31/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5055	C2881	C2882	Minutes of Special Meeting of the Executive Committee of Chevron Corporation Thursday, April 22, 1999 re: Proposed contribution of \$5 million to International Foundation For Education and Self-Help to support The Western Niger Delta Development Program	1999 Meeting Minutes are irrelevant and too remote in time. FRE 401-403.		
5056	C046608	C046608	Minutes for the Special Meeting of the Board of Directors of Chevron Overseas Petroleum Inc., dated 7/9/1999	1999 draft minutes are irrelevant and too remote in time. Minutes are not signed and therefore not final and could mislead the jury. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5057			Excerpt from Chevron Corp's Form 10-Q quarterly report filed with the SEC, for the period ending 9/30/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5058	C0614	C0677	Chevron Corporation 1999 Annual Report, "The Energy to Grow" re: New technologies and the Company's financial status, dated 1999	Exhibit is duplicative of 367 (Rick Brown). FRE 403. Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. Bowoto, 312 F. Supp. 2d at 1240 (quoting Phoenix Canada Oil Co. v. Texaco, Inc., 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See Sonora Diamond Corp. v. Super. Ct., 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); U.S. v. Bestfoods, 524 U.S. 51, 71-72 (1998); see also Calvert v. Huckins, 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5059			Excerpt from Chevron Corp's Form 10-K annual report filed with the SEC, for the fiscal year ending 12/31/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5060			Form 10-K Chevron Corp - CVX for the period of December 31, 1999, Annual report which provides a comprehensive overview of the company for the past year, dated 3/20/2000	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5061	C0486	C0495	Document entitled, "By-Laws of Chevron Corporation As Amended March 29, 2000"	2000 amendment to Chevron Corporation bylaws is irrelevant, unduly prejudicial and misleading due to corporate reformation in late 1998 and is too remote in time. FRE 401-403.		
5062	C0469	C0485	Document entitled, "Restated Certificate of Incorporation, May 3, 2000 and By-Laws, As Amended March 29, 2000 of Chevron Corporation"	2000 amendment to Chevron Corporation is irrelevant, unduly prejudicial and misleading due to corporate reformation in late 1998 and is too remote in time. FRE 401-403.		
5063	C1246	C1246	Data Sheet Report re: Chevron Corporation, dated 8/3/2000	2000 data sheet for Chevron Corporation is irrelevant, unduly prejudicial and misleading due to corporate reformation in late 1998 and is too remote in time. FRE 401-403.		
5064	C1580	C1580	Chart, The Chevron Way- Corporate Metrics	Excerpt of 2000 exhibit is irrelevant, unduly prejudicial and misleading due to corporate reformation in late 1998 and is too remote in time. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5065	B00001	B00012	Chevron Corporation Hierarchy over time re: stockholders, board of directors, executive committee, chairman of the board etc	2000 organization charts prepared for informational purposes only for Chevron Corporation are irrelevant, unduly prejudicial and misleading due to corporate reformation in late 1998 and is too remote in time. FRE 401-403.		
5066	C1305	C1309	Chevron Overseas Petroleum Inc. By-Laws amended 11/3/1992	1992 bylaws for COPI are irrelevant, unduly prejudicial and too remote in time. FRE 401-403.		
5067	C117960	C117700	Unanimous consent of sole stockholder of Chevron U.S.A. Inc., 12/30/93	Plaintiffs did not provide this exhibit and the exhibit does not correspond to the cited Bates numbers (which are non-sequential). Nor is the description sufficient for defendants to object. Defendants reserve all rights to object to this exhibit.		
5068	CS008953	CS008954	Unanimous Consent of Directors of Chevron Overseas Petroleum dated 1/1/1994			
5069	CS008905	CS008905	Memo from Krattebol to Winter dated 6/22/94 re: Request to Transfer Assets from COPI to Chevron Overseas Petroleum			
5070	CS008900	CS008900	Email from Soler to Krattebol, etc. date uncertain, re: COPI to COP asset distribution			
5071	CS008901	CS008901	Memo from Forbes to Krattebol, etc. dated 6/30/94 re: Intercompany Distribution of Assets from Chevron Overseas Petroleum Inc. to Chevron Overseas Petroleum A Division of Chevron U.S.A. Inc			
5072	CS008924	CS008924	Memo from Matzke to Bonney dated 8/26/94 re: Corporate Simplification			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5073	CS008680	CS008681	Chevron Overseas Petroleum Inc. list of directors, officers, incorporation information, etc., dated 9/19/1994			
5074	CS008682	CS008682	Transocean Chevron Company list of directors, officers, incorporation information, etc., dated 9/20/1994			
5075	CS008929	CS008929	Memo from Beebe to Klitten dated 10/3/94 re: Proposed OCS Reorganization to Minimize State Taxes			
5076	CS008927	CS008927	Memo to Klitten dated 10/4/94 re: COPI Restructuring Status			
5077	CS008921	CS008921	Email chain from Soler to Kuba, etc. dated 11/28/94 re: 482- COPI merger into COP; Policy 30			
5078	CS008920	CS008920	Email from Susa to Soler, etc., dated 12/8/94 re: COPI Merger into COP			
5079	CS008883	CS008883	Memo from McAuley to Matzke, etc. dated 12/21/94 re: Chevron U.S.A. Inc. Unanimous Consent of Directors, adopting resolutions effecting merger of COPI into CUSA			
5080	CS008936	CS008937	Minutes of meeting of Chevron Overseas Petroleum Inc. dated 12/21/94 adopting resolution that COPI and CUSA should merge			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5081	C117702	C117702	Consent of sole shareholder of Chevron U.S.A. Inc. dated 12/21/94 to adopt merger of COPI and CUSA			
5082	CS008884	CS008884	Memo from Forbes to Krattebol, etc., dated 12/21/94 re: Chevron Overseas Petroleum Inc. - Merger Into Chevron Overseas Petroleum, a Division of Chevron U.S.A. Inc.			
5083	C117705	C117706	Unanimous consent of directors of Chevron U.S.A. Inc., dated 12/21/94			
5084	C117685	C117687	Regular Meeting of the Board of Directors of Transocean Chevron Company and Resolutions adopted, dated 12/21/94			
5085	C2806	C2807	Articles of merger-Domestic Business dated 12/28/94 re: merger of COPI and CUSA			
5086	CS008938	CS008938	Agreement and Plan of Merger Between COPI and CUSA, effective 12/31/94	Incomplete, missing signature page. FRE 106, 401-403.		
5087	CS008939	CS008939	Signature page of Agreement and Plan of Merger Between COPI and CUSA, effective 12/31/94	Incomplete, document missing - signature page only. FRE 106, 401-403.		
5088	C117703	C117704	Agreement and Plan of Merger Between COPI and CUSA, effective 12/31/94			
5089	CS998684	CS998685	Chevron Overseas Petroleum Inc. list of directors, officers, incorporation information, etc., dated 1/6/1995			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5090	CS008686	CS008686	Chevron Overseas Petroleum Inc. list of directors, officers, incorporation information, etc., dated 1/9/1995			
5091	CS008744	CS008744	Chevron Overseas Petroleum list of directors, officers, incorporation information, etc., dated 8/4/95			
5092	C2713	C2737	By-Laws of Chevron U.S.A. Inc., effective 1/1/96			
5093	CS008740	CS008740	Chevron Overseas Petroleum list of directors, officers, incorporation information, etc., dated 6/18/96	Too remote in time; irrelevant. FRE 401-403.		
5094	C23759	C23759	Organizational chart, Chevron Overseas Petroleum, Inc., dated 9/9/96	Too remote in time; irrelevant. FRE 401-403.		
5095	C31340	C31355	COPI Business Plan Vol. 2, 1997-1999 (information not specific to Nigeria redacted)	COPI 1996 Business Plan regarding Opolo Field development is irrelevant, too remote in time, would confuse the jury and cause undue delay. FRE 401-403. Duplicative of 1652 (Soler). FRE 403.		
5096	C31356	C31410	Nigeria Business Unit Business Plan 1998-2000, dated 11/97	Portions of exhibit relating to exploration, UADP and environmental issues are speculative, irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403, 602.		
5097	C31411	C31425	1998-2000 COPI Business Plan (information not specific to Nigeria redacted)	COPI 1996 Business Plan regarding development and exploration projects is irrelevant, speculative, too remote in time, would confuse the jury and cause undue delay. FRE 401-403, 602. Duplicative of 2501 (Hagstrom). FRE 403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5098	C1271	C1314	Document entitled, "Certificate of Ownership and Merger of Iran Chevron Oil Company (a Delaware Oil Company) into Chevron Overseas Petroleum (a Delaware corporation), w/ multiple memos and certificates attached	Bates numbers C001291-1314 include irrelevant documents regarding Venezuela Gulf Oil Company which would confuse the jury. FRE 401-403.		
5099	CS008212	CS008212	Chevron U.S.A. Inc, list of directors, officers, incorporation information, etc., dated 2/3/98			
5100	C31426	C31471	1999-2001 COPI Business Plan (information not specific to Nigeria redacted)	Portions of exhibit relating to exploration and environmental issues are speculative, irrelevant, unduly prejudicial and would mislead the jury. Exhibit is too remote in time. FRE 401-403, 602.		
5101	CS008721	CS008721	Chevron Overseas Petroleum Inc. list of directors, officers, incorporation information, etc., dated 2/17/1999	Exhibit is irrelevant and too remote in time. FRE 401-403.		
5102	CS008324	CS008324	Chevron U.S.A. Inc, list of directors, officers, incorporation information, etc., dated 5/21/99	Exhibit is irrelevant and too remote in time. FRE 401-403.		
5103	C31472	C31524	COPI Business Plan 2000-2002 (information not specific to Nigeria redacted)	2000-2002 COPI Business is too remote in time, irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
5104	C1263	C1263	Data Sheet Report re: Chevron U.S.A. Inc. dated 11/7/2000	Exhibit is irrelevant and too remote in time. FRE 401-403.		
5105	CS008559	CS008518	List of names of officers of various Chevron subsidiaries	1993 document is irrelevant and too remote in time. FRE 401-403.		
5106	CS008620	CS008622	Chevron U.S.A. Inc, list of directors, officers, incorporation information, etc.	1994 document is irrelevant and too remote in time. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5107	C26681	C26681	COPI Section I Business Plan Summary (for Nigeria SBU only)	1999 document regarding reserves forecast is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. Bowoto, 312 F. Supp. 2d at 1240 (quoting Phoenix Canada Oil Co. v. Texaco, Inc., 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See Sonora Diamond Corp. v. Super. Ct., 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); U.S. v. Bestfoods, 524 U.S. 51, 71-72 (1998); see also Calvert v. Huckins, 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5108	C26582	C26582	COPI Section II Business Plan Summary (for Nigeria SBU only)	1999 document regarding reserves forecast is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. Bowoto, 312 F. Supp. 2d at 1240 (quoting Phoenix Canada Oil Co. v. Texaco, Inc., 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See Sonora Diamond Corp. v. Super. Ct., 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); U.S. v. Bestfoods, 524 U.S. 51, 71-72 (1998); see also Calvert v. Huckins, 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5109			Letter Brief dated 10/1/02 from Defendants opposing Plaintiffs' efforts, <i>inter alia</i> , to obtain Rule 30(b)(6) testimony from corporate designees of defendant ChevronTexaco Overseas Petroleum, Inc. (CTOP)	Irrelevant, confusing, waste of time. FRE 401-403.		
5110			Letter dated 10/25/02 from defense counsel John M. Grenfell identifying Rule 30(B)(6) witnesses for Chevron Texaco Overseas Petroleum, Inc. (CTOP)	Irrelevant, confusing, waste of time. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5111			Defendants' Objections and Response to the Declaration of Barbara Enloe Hadsell and Plaintiffs' "Evidence Rule 1006 Summary of Facts"	Exhibit is an impermissible attempt to sidestep the requirements of Federal Rule of Evidence 1006 and admit the hearsay, argumentative, inaccurate and prejudicial "summary" of Barbara Hadsell. As defendants' objections make plain, it does not satisfy any of the Rule 1006 requirements, particularly since much of the evidence is inadmissible and it is inaccurate. FRE 401-403, 802, 1006.		
5112	C26618	C26742	COP1 Business Plan (information not specific to Nigeria redacted)	2002 document regarding budget planning and forecasts is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. Bowoto, 312 F. Supp. 2d at 1240 (quoting Phoenix Canada Oil Co. v. Texaco, Inc., 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See Sonora Diamond Corp. v. Super. Ct., 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); U.S. v. Bestfoods, 524 U.S. 51, 71-72 (1998); see also Calvert v. Huckins, 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5113	C13263	C13263	Letter from Crowe to Potter and others, dated 1/27/1997, re: Gifts to Foreign Officials Request For Increase in Authority	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. <i>See, e.g.</i> , 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5114	C13258	C13259	Letter from Potter to Bates and others, dated 2/5/1997. re: Gifts to Foreign Officials COPI gift giving policy, Distribution List	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5115	C17749	C17762	Guidelines for Compliance with the Foreign Corrupt Practices Act dated 4/20/99, from COPI in San Ramon, CA	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. <i>See, e.g.</i> , 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). <i>See also</i> Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5116	C23598	C23607	Memo from Potter to Crowe and others, dated 4/20/1999, re: Guidelines for Compliance with the Foreign Corrupt Practices Act	Exhibit is irrelevant, unduly prejudicial and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including FCPA compliance. See, e.g., 15 U.S.C. §§ 78m(b)(2)(A), (b)(2)(B) (requiring maintenance of accurate books and records, including payments by foreign subsidiaries, and "internal accounting controls" to record such payments properly). See also Jury Instrs. (Dkt. 1837), p. 158 (acts not considered evidence of agency include "preparation and filing of consolidated financial statements or annual reports that include information about subsidiaries of Chevron Corp.; [and] the adoption of internal accounting controls governing payments to foreign officials").		
5117	C3326	C3326	Chevron Policy, Expatriate H.R. Manual, Expatriate Vacations, dated 11/2/92	1992 manual is irrelevant, remote in time, would confuse the jury and is not evidence of specific agency. FRE 401-403.		
5118	C3332	C3332	Chevron Policy, Expatriate H.R. Manual, Compensation-Tax Equalization, dated 1/12/94	1994 manual is irrelevant, remote in time, would confuse the jury and is not evidence of specific agency. FRE 401-403.		
5119	C117014	C117028	Annual Performance Management Worksheet for Kirkland, dated 1/1/1996 - 12/1996	Individual's 1996 performance evaluation is irrelevant, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
5120	C038378	C038378	Email from Stone to Connon, Etc., dated 9/5/96 re: Expatriate HR Policy Study	1996 study is irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5121	C038749	C038758	Expatriate H.R. Policy Study - Project Report, dated 10/9/96	1996 study is irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5122	C038759	C038765	Email from Long to Mallin, etc., dated 10/10/96 re: Expat Study GRT-October 10, 1996, with attached report	1996 study is irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5123	C038379	C038385	PowerPoint presentation dated 1/15/97 re: Expatriate Policy Study	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5124	C052376	C052377	Letter from Derr to unknown recipient dated 2/3/1997 re: 1996 Management incentive plan worksheets and instructions	1997 letter to unknown person regarding management incentive worksheets is irrelevant, remote in time and is not evidence of specific agency. FRE 401-403.		
5125	C038776	C038795	Presentation slides for the Expatriate HR Policy Study, GRT Meeting - February 27, 1997	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5126	C038796	C038825	Expatriate HR Policies Study - Management Interview Questionnaire	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5127	C038833	C038855	Agenda and minutes of a meeting held 5/8/97 - Expatriate HR Policy Study - Guidance Review Team Meeting	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5128	C038866	C038869	Memo from KPMG consultant to Jon Lindberg at Chevron dated 5/15/97 re: Cost Projections for tax review team (prepared for expatriate employees going to Nigeria and other countries)	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5129	C033870	C038913	PowerPoint presentation entitled Expatriate HR Policies Study, Guidance Review Team Meeting, June 12, 1997	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5130	C038914	C038953	Notes from Don Webster dated 7/12/97 re: rotational employees and ICE enhancements, handwritten note: "OPCO and COPI [Management] comments on policies from 6/12 GRT [meeting]"	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5131	C039000	C039026	Email from Long to Malling, etc. dated 8/27/97 re: Expatriate HR Policy Study Recommendations, with attached PowerPoint presentation for presentation to corporate Executive Committee	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5132	C038547	C038559	Expat Policy Rollout Presentation Material, updated 10/31/97	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5133	C038386	C038440	Notes accompanying a PowerPoint presentation on "Policies for Chevron's International Workforce"	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5134	C038441	C038495	PowerPoint presentation on "Policies for Chevron's International Workforce," dated 11/6/97	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5135	C038679	C038733	PowerPoint presentation on "Policies for Chevron's International Workforce," dated 11/6/97	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5136	C049028	C049036	Letter from Scott to Barhold and others dated 3/30/1998 re: Contract Administrator Career Ladder/Roster	April 1998 COPI PDC process is irrelevant, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
5137	C049030	C049033	Letter from Potter dated 4/1/1998 re: COPI Contracting Career Ladder	April 1998 COPI PDC process is irrelevant, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
5138	C038991	C038993	Program for Expatriate Study Awards Ceremony, April 1, 1998, Scott's Seafood Bar & Grill, Walnut Creek, CA	Awards program is irrelevant, would mislead the jury and cause undue delay. FRE 401-403.		
5139	C049006	C049026	Letter from Potter to COPI Finance Employees dated 5/6/1998 re: Personnel Selection Process, with attached results of study of existing personnel selection process	May 1998 COPI PDC process is irrelevant, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
5140	C038734	C038748	Expatriate H.R. Policy Study - Project Report, dated 5/28/98	Late May 1998 Survey is irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
5141	C038994	C038998	Typed notes of Expatriate HR Policy Study Wrap-Up Meeting, June 8, 1998	July 1998 Survey is irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
5142	C038024	C038160	Participant Report: Rotational International Assignments Survey, July 1998, Exxon Company, International	July 1998 Survey is irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		
5143	C038240	C038376	Participant Report: Rotational International Assignments Survey, July 1998, Exxon Company, International	July 1998 Survey is irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5144	C24015	C24017	Memo from Jay Pryor at COPI San Ramon SBU (Human Resources) to HR Managers and Managing Directors dated 12/9/98 re: Rotational Location Premiums	December 1998 letter re: location premiums is irrelevant, remote in time, and is not evidence of specific agency. FRE 401-403.		
5145	C038496	C038546	Notes accompanying a PowerPoint presentation on "Policies for Chevron's International Workforce"	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5146	C038560	C038584	Draft letter from Sullivan congratulating employee for being selected for an international assignment with Chevron	Draft letter is not final and undated. It is speculative, irrelevant and is not evidence of specific agency. FRE 401-403, 602.		
5147	C038585	C038600	Draft letter to employee explaining being selected for an international assignment with Chevron	Draft letter is not final and undated. It is speculative, irrelevant and is not evidence of specific agency. FRE 401-403, 602.		
5148	C038601	C038623	Draft letter to employee explaining being selected for an international assignment with Chevron	Draft letter is not final and undated. It is speculative, irrelevant and is not evidence of specific agency. FRE 401-403, 602.		
5149	C038624	C038678	Notes accompanying a PowerPoint presentation on "Policies for Chevron's International Workforce"	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5150	C038826	C038832	Expatriate HR Policies Study - Management Interview Questionnaire, notes	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5151	C038854	C038865	Proposed policies for Expatriate HR Policies Study	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5152	C038956	C038962	Chart of salary data from 1065 US Expats	Salary data is irrelevant, unduly prejudicial and is not evidence of specific agency. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5153	C038963	C038982	PowerPoint presentation re: Long Term ICE Service Incentive	Document appears to be post-1998. Presentation on ICE program proposals is irrelevant, would mislead the jury and is not evidence of specific agency. FRE 401-403.		
5154	C038983	C038989	Typed notes re: Transition Issues, Employees Currently on Home-Country or Rotational Assignments	Speculative notes regarding issues and costs of expat employees are irrelevant, unduly prejudicial and are not evidence of specific agency. FRE 401-403, 602.		
5155	C38990	C38990	Memo entitled "Expatriate HR Policy Study"	1997 study is ongoing, speculative, irrelevant, remote in time, unduly prejudicial and is not evidence of specific agency. FRE 401-403, 602.		
5156	C0948	C0955	Opolo Field Development Appropriation Request Approval, dated 1/8/96	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5157	C0942	C0968	Chevron's Executive Committee approvals of appropriation requests submitted by COPI on behalf of CNL, Opolo Field Development, 1996	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5158	C2210	C2210	Work requisition #G152689 to be used for 96-COPI-NV 12 FE & Operations Services signed by Anyigbo, dated 3/1/96	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5159	C2132	C2132	Work Requisition #152605, dated 3/22/1996	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5160	C2133	C2133	Work requisition # G152606 to be used for artificial lift study signed by Koelmel, dated 3/22/96	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5161	C0971	C0978	Ewan Field Development Appropriation Request Approval, dated 4/1/96	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5162	C0969	C0999	Chevron's Executive Committee approvals of appropriation requests submitted by COPI on behalf of CNL, Ewan Field Development, 1996	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5163	C2135	C2135	Work requisition #G152608 to be used for May 96 Horizontal Well Trip signed by Koelmel, dated 4/16/96	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5164	C2146	C2147	Memo from Ankenbauer to May etc., dated 6/18/96, re: Approved GO-113, 96-CPTC-RP-02, Earth Science Consulting and Specialized Services Program, w/ attached work requisition	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5165	C2148	C2149	Work requisition #G-152617 to be used from 96-CPTC-RP-08 signed by Koelmel, dated 6/26/96, w/ attached memo	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5166	C2153	C2154	Memo from Koelmel to Brown etc., dated 7/4/96, re: 1996 Reserves data processing and database maintenance, w/ handwritten notes & attached work requisition	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5167	C2155	C2156	Memo from Koelmel to Brown etc., dated 7/25/96, re: Work requisition #G-152621, Feasibility Study on Reduction of High GOR Production, w/ attached work requisition	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5168	C2159	C2160	Memo from Koelmel to Brown etc., dated 8/1/96, re: Work requisition #G-152623, Ohaji South 4 Well Test, w/ attached work requisition	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5169	C2167	C2168	Memo from Koelmel to Brown etc., dated 8/13/96, re: Feasibility study: Slimhole/Monobore Technology vs. Conventional Wellbores with Dual Completions, w/ attached work requisition	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5170	C2165	C2165	Memo from Koelmel to Brown etc., dated 8/22/96, re: Licensing Fee for Blitz Numerical Solver	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5171	C2171	C2171	Memo from Koelmel to Brown etc., dated 9/10/96, re: GO-113- CRTC- Richmond, Crude Oil Assay Work for Ohaji Field	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5172	C2175	C2176	Memo from Koelmel to Brown etc., dated 9/18/96, re: Topcon Support for 1996, w/ attached work requisition	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5173	C2173	C2174	Memo from Koelmel to Cook etc., dated 9/20/96, re: RobertKiri C-03 & C-08 Simulation Study RobertKiri E-12 Data Gathering, w/ attached work requisition	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5174	C2177	C2178	Memo from Koelmel to Brown etc., dated 10/10/96, re: GO-113 #G152632 Gbokoda/Dibi Development Plans	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5175	C34302	C34337	PowerPoint presentation re: Ohaji South Field Development UADP Workshop, Lagos, November, 1996	1996 PowerPoint for a UADP Workshop has no relevance, would mislead the jury and cause undue delay. FRE 401-403.		
5176	C2185	C2187	Work requisition #G-152637 to be used for Ohaji Development Plan signed by Koelmel, dated 11/7/96, w/ attached memo and work requisition	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5177	C2193	C2195	Memo from Koelmel to Brown etc., dated 11/22/96, re: approved requisition authorizing \$80,000 for San Ramon staff, w/ attached work requisition and review	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5178	C2202	C2203	Memo from Koelmel to Brown etc., dated 12/11/96, re: Reservoir Management General Support Work Requisition, with attached work requisition	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5179	C1042	C1099	Report entitled, "Chevron Nigeria Limited Gbokoda/Dibi Development," dated 12/19/96	Multiple documents in exhibit would confuse the jury. 1996 Report on Dibi Development and 1997 work orders are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5180	C1013	C1052	Chevron's Executive Committee approvals of appropriation requests submitted by COPI on behalf of CNL, Gbokoda/Dibi Development Project, 1996	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5181	C2253	C2253	Work requisition, dated 12/31/96	1996 work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5182	C2137	C2137	Memo from Schull to Brown etc., dated 7/22/97, re; Supplement to Work Requisition #G-152611, Ewan Reservoir Simulation	1996 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5183	C1072	C1099	Chevron's Executive Committee approvals of appropriation requests submitted by COPI on behalf of CNL, Phase 2 of development of Escravos Gas Project, 1997	1997 memo re: work request is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5184	C1182	C1231	Chevron's Executive Committee approvals of appropriation requests submitted by COPI on behalf of CNL, Supplemental request for Gbokoda/Dibi Development Project, 1998	Executive Committee approval regarding Gbokoda/Dibi Project approval is irrelevant and is not evidence of specific agency. It would mislead the jury and cause undue delay. FRE 401-403.		
5185	C34376	C34458	PowerPoint presentation re: Chevron Project Development and Execution Process (CPDEP) Workshop, 1999	Exhibit is duplicative of 2503 (Hagstrom). FRE 403. A PowerPoint for a 1999 Workshop on CPDEP has no relevance, would mislead the jury and cause undue delay. FRE 401-403.		
5186	C34712	C34294	PowerPoint presentation re: Chevron Project Development and Execution Process (CPDEP) Workshop, 1999	1999 PowerPoint for a CPDEP Workshop has no relevance, would mislead the jury and cause undue delay. FRE 401-403.		
5187	C1135	C1166	Chevron's Executive Committee approvals of appropriation requests submitted by COPI on behalf of CNL, Supplemental request for Ewan Field Development Project, 1999	999 Executive Committee approval regarding Ewan Field Project approval is irrelevant, is not evidence of specific agency and is outside the relevant time period. It would mislead the jury and cause undue delay. FRE 401-403.		
5188	C2224	C2224	Work requisitions #G-228342 & G-228341	1996 work orders are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5189	C2128	C2129	Work requisition, GO-113, w/ attached memo from Koelmel to Brown etc., GO-113- Nigeria SBU San Ramon- Opuekeba Field Study Phase 1	1996 work requisition regarding Opuekeba is irrelevant, is too remote in time and is not evidence of specific agency. It would mislead the jury and cause undue delay. FRE 401-403.		
5190	C2062	C2079	All Work Orders (GO-113) Issued by CNL to Affiliates from 1996 - August 2000 (Report)	1996-1997 and 1999-2000 work requisition summaries are irrelevant and too remote in time. None of the work order summaries are evidence of specific agency. Evidence would mislead the jury and cause undue delay. FRE 401-403.		
5191	C2080	C2254	All Work Orders (GO-113) Issued by CNL to Affiliates - Documents for 1996	All 1996 work orders are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5192	C2255	C2377	All Work Orders (GO-113) Issued by CNL to Affiliates - Documents for 1997	All 1997 work orders are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5193	C2441	C2534	All Work Orders (GO-113) Issued by CNL to Affiliates - Documents for 1998	All 1998 work orders are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5194	C2378	C2440	All Work Orders (GO-113) Issued by CNL to Affiliates - Documents for 1999 & 2000	All 1999-2000 work orders are irrelevant, too remote in time and are not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5195	C34269	C34375	PowerPoint presentation re: Asset Classification and other topics for CPDEP/UADP Workshop	Exhibit is duplicative of 2500 (Hagstrom). FRE 403. Document on CPDEP / UADP as applied to exploration has no relevance, would mislead the jury and would cause undue delay. FRE 401-403.		
5196	C1807	C1809	Amendment to Counsel and Service Agreement Between CNL and COPI approved 1/17/92			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5197	C22886	C22887	Report from Taylor to Burns and others dated 1/25/1996 re: Nigeria Security Summary and Assessment	Report regarding political climate in Nigeria is irrelevant, waste of time. FRE 401-403.		
5198	C1010	C1012	Letter from Derr to Matzke dated 5/9/1996 re: Increased contribution for University and Community Scholarships Program and Letter from Matzke to Derr dated 5/9/1996 re: Contribution Request			
5199	C1014	C1030	Letter from Matzke to Derr dated 12/6/1996, re: Gbokoda/Dibi Development Appropriation Request Approval for a total investment of \$199.723 million, with attached appropriation request	1996 appropriation request for Dibi is irrelevant, too remote in time and is not evidence of specific agency. Would mislead the jury and cause undue delay. FRE 401-403.		
5200	C4939	C4939	Foreign Payroll Billing, Pay Period 3/31/1997	1997 individual employee paystub is irrelevant, unduly prejudicial and is not evidence of specific evidence. FRE 401-403.		
5201	C1059	C1059	Letter from Kirkland to Matzke and others dated 6/13/1997 re: Excom Presentation - Nigeria Financing	1997 letter re: financing is irrelevant, too remote and is not evidence of specific agency. Would confuse the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5202	C1056	C1057	Letter from Derr to Matzke and others, dated 6/24/1997, re: Executive Committee meeting, proposed CNL US Dollar borrowing authority of up to \$100 million, increase in CNL's Naira borrowing authority, proposal to initiate discussions with the Nigerian government on alternative ways to finance the Gbokoda/Dibi Development project.	Exhibit is duplicative of 73 (Kirkland). FRE 403. 1997 letter re: financing is irrelevant, too remote and is not evidence of specific agency. Would confuse the jury and cause undue delay. FRE 401-403.		
5203	C1961	C1961	Recommendation of Interim Dividend for the 3rd Quarter of 1997 and Authorization and Approval of a credit Agreement for Financing the Second Phase of the Escravos Gas Project	Exhibit is incomplete, should be C01960-63. FRE 106. 1997 CNL meeting minutes re: Escravos project are irrelevant, would cause undue delay and confuse jury. FRE 401-403.		
5204	C045361	C045361	Uniform Accounting Manual - Account Description (Volume I) dated 11/1/1997	Exhibit is irrelevant, incomprehensible, too remote in time and would confuse the jury. FRE 401-403.		
5205	C2868	C2868	Regular Meeting of the Executive Committee of Chevron Corporation, dated December 18, 1997	Exhibit is incomplete, should be C002868-70. FRE 106. Exhibit is irrelevant and remote in time. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5206	C048888	C048904	Letter from Potter to Matzke and others dated 1/22/1998 re: Consolidated Management Report, with attached report regarding Nigerian SBU financials	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5207	C051249	C051250	Email string from Taylor to Omole, etc. dated 2/12/98 re: Human Rights Watch Africa	Correspondence among CNL employees is hearsay. FRE 802. Discussion regarding Ogoni/Shell and content of HRW letter is hearsay and is irrelevant and misleading. FRE 401-403.		
5208	C1183	C1187	Letter from Matzke to Derr and others dated 2/18/1998 re: Gbokoda/Dibi Development Appropriation Request Supplement Approval, the building of a flowstations	Exhibit is duplicative of 272 (Bates). FRE 403. Memo re: work request is irrelevant and is not evidence of specific agency. It would mislead the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5209	C049062	C049062	Memo to Matzke dated 6/26/98 re: 1999-2000 Sole Risk Exploration Program	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5210	C049066	C049066	Memo from Kirkland to Argungu dated 6/26/98 re: NNPC Loan Agreement - Floating Storage and Off-Loading Vessel (FSO Escravos Gas Project Phase I)	June 1998 memo regarding financing loan re: Escravos Gas Project is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
5211	C111946	C111988	Daily News Report re: Chevron, dated 9/8/1998	News articles are hearsay. FRE 802. News articles regarding events after Parabe that do not address Parabe are irrelevant, misleading and prejudicial. FRE 401-403. C111977-78 is duplicative of other exhibits and defendants incorporate the objections to those exhibits here. FRE 401-403.		
5212	C049061	C049061	Memo from Kirkland to Matzke dated 10/7/98 re: Escravos Gas -to- Liquids Project Update	October 1998 memo regarding Escravos Gas Project is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5213	C20507	C20512	Nigeria Strategic Business Unit Exceptions list re: Compliance subject, description of exception, plan for corrective action or process implementation plan with estimated completion date, and other comments.	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5214	C049069	C049070	Letter from Kirkland to Matzke dated 2/12/1999 re: Additional Chevron Nigeria LTD Financing	1999 exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5215	C23536	C23527	Letter from Kirkland to Matzke dated 8/27/1999 re: TOP CON (Texaco) Nigeria JV Operations	Defendants are assuming the correct bates range for this exhibit is C23526-27. 1999 document regarding unrest and production shut-ins is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
5216	C1233	C1233	Letter from Robertson to Matzke and others dated 6/9/2000 re: Nigerian Business Unit Bids For Deepwater Leases	2000 letter re: leases is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
5217	C052398	C052398	Statement re: MIP Award recommendations by O'Reilly	Document is incomplete and should include C52397-98. 2000 incentive award recommendations is irrelevant, too remote in time and would mislead the jury. FRE 401-403.		
5218	C046599	C046605	Charts regarding the sale of CNL crude to a destination in Philadelphia	Documents regarding sales of CNL crude are irrelevant, unduly prejudicial, and would confuse the jury. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5219	C048270	C048270	Chevron International Trading Co receipt for Nigerian Crude Oil	1999 Document regarding sales of crude are irrelevant, unduly prejudicial, and would confuse the jury. FRE 401-403.		
5220			Chart of CNL Crude Shipped from Escravos to the United States (1996-1999)	Plaintiffs have not provided this exhibit and defendants reserve their right to object accordingly. Based on the description, summary of crude shipped is irrelevant, would mislead the jury and cause undue delay. FRE 401-403.		
5221	C048157	C099078	Numerous Crude oil Sales Receipts from Chevron Nigeria Limited	Almost 51,000 pages of crude oil sales receipts are irrelevant, unduly prejudicial and would cause undue delay. Receipts from 1996 1997 and 1999 are too remote in time. FRE 401-403.		
5222	C042000	C044412	Handwritten Logs re: the sale of CNL crude, including name of tanker and destination, from January 1996 - December 1999	Over 2,000 pages of crude oil sales receipts are irrelevant, unduly prejudicial and would cause undue delay. Receipts from 1996-1997 and 1999 are too remote in time. FRE 401-403.		
5223	C1781	C1782	Certificate of Incorporation of a Company for Chevron Nigeria Limited, previously called Gulf Oil Company (Nigeria) Limited, dated 7/16/1991			
5224	C1980	C2061	Joint Operating Agreement between Nigerian National Petroleum Corporation and Gulf Oil Company (Nigeria) Limited, effective 7/25/91, with attached letter from Mahura to Nigerian National Petroleum Corporation, dated 7/22/1991 re: clause 2.7 of Joint Operating Agreement	Partly duplicative of plaintiffs' 1715 (Howard). FRE 403.		
5225	C049092	C49124	Memorandum of Understanding between NNPC and CNL, dated 7/25/91			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5226	CS008001	CS008001	CNL list of directors, officers, incorporation information, etc., dated 7/22/1994	1994 document is too remote. FRE 401-403.		
5227	CS008002	CS008002	CNL list of directors, officers, incorporation information, etc., dated 1/26/1995	1995 document is too remote. FRE 401-403.		
5228	C17512	C17516	Chevron Nigeria Limited - Chevron vision, The Petroleum Company of Choice in Nigeria, 1996, with entry dated 12/7/93 that Chevron formed a new exploration company named CPNCL for exploring Benue Trough	Exhibit is speculative, too remote in time and exploration of Benue trough is irrelevant. FRE 401-403, 602.		
5229	C1813	C1813	Chevron Nigeria Limited Director's Report For The Year Ended 31 December 1996, dated 12/31/1996			
5230	C26399	C26535	Chevron Nigeria Limited Organization Chart, Including Departmental Breakdowns (e.g., Finance, Legal, etc.)	137 page compilation of organizational charts and summaries is irrelevant, would confuse the jury and cause undue delay. Portions of exhibit summarizing unrelated legal and environmental issues are unduly prejudicial and would mislead the jury. FRE 401-403.		
5231	C26259	C26389	Chevron Nigeria Limited report entitled, "Briefs for First Term 1997 NNPC/Chevron Operating Committee Meeting," dated 5/14/97	131 page compilation of 1996 information is too remote in time, irrelevant and would cause undue delay. Portions of exhibits discussing unrelated oil spills and environmental issues are irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
5232	C1837	C1837	Chevron Nigeria Limited Director's Report For The Year Ended 31 December 1997, dated 12/31/1997			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5233	C12255	C12258	Email from Steffinger to Benson and others dated 1/7/1998 re: CNL 1997 3rd Quarter Dividend, and further email chain	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5234	C1942	C1944	Minutes of 27th Annual General Meeting of Chevron Nigeria Limited at 11:15 A.M. on Wednesday, June 10, 1998, In Conference Room No. 338E at the Company's Office, Lekki Peninsula, Lagos, re: Professor Grace Alele Williams reelected to the Board.	Bates number C001944 is not part of the described exhibit and is misleading. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5235	C1957	C1959	Minutes of 84th Meeting of the Directors of Chevron Nigeria Limited Held at Conference Room No. 338E (3rd Floor) Chevron Nigeria Limited Main Office Building, Lekki Peninsula, Lagos on Wednesday, June 10, 1998, at 10:15 A.M., re: The company's accounts and the report of the auditors and directors for the year ended December 31, 1997 be recommended to the shareholders for adoption at its 27th Annual General Meeting.			
5236	C1953	C1956	Minutes of the 85th Meeting of the Directors of Chevron Nigeria Limited Held in the Offices of Chevron Corporation, 575 Market Street, San Francisco, California, USA, on Monday September 28, 1998, at 10:10AM re: Environmental Insurance Claims settlement and appointment of Anyigbo and Schull to directors of Chevron Nigeria Limited			
5237	CS008009	CS008011	CNL list of directors, officers, incorporation information, etc., dated 9/29/1998			
5238	C1517	C1577	Document entitled, "Certificate of Incorporation, Nigeria Chevron Beta Limited," dated 12/1/98			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5239	C1464	C1514	Document entitled, "Certificate of Incorporation, Nigeria Chevron Alpha Limited," dated 12/1/98			
5240	C1861	C1861	Chevron Nigeria Limited Director's Report For The Year Ended 31 December 1998, dated 12/31/1998			
5241	C1858	C1877	Chevron Nigeria Limited Report and Financial Statements dated 12/31/1998, re: profit and loss account for 1998, statement of accounting policies, report of directors	Duplicative of Exhibits 267 (Mitchell) and 371 (Brown, Rick). FRE 403. Irrelevant. FRE 401-402.		
5242	C1949	C1952	Minutes of the 86th Meeting of the directors of Chevron Nigeria Limited Held at the Company's Office, 2 Chevron Drive, Lekki Peninsula, Lagos, on Monday June 7, 1999, at 10:30 AM, re: Appointment of Wilcox as a director of Chevron Nigeria Limited, Authorization for opening bank accounts, and ratification of fixing the company's seal to documents.			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5243	C048354	C048355	CNL General Ledger Posting Report, 2/2/96	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5244	C048340	C048353	CNL Restatement of Postings at Current Rates (1995-1996), including an email dated 3/1/96 to CNL employees re: intercompany transfer price for particular shipments of crude oil from CNL to Chevron International Trading Company	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5245	C048855	C048861	CNL General Ledger Posting Report, 4/30/1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5246	C048862	C048867	CNL General Ledger Posting Report, 6/3/96	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5247	C048819	C044847	CNL General Ledger Posting Report, 7/2/96	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5248	C048827	C048835	CNL General Ledger Posting Report, 7/31/96	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5249	C048878	C048884	CNL General Ledger Posting Report, 9/2/96	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5250	C048848	C048854	CNL General Ledger Posting Report, 10/2/1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5251	C048347	C048355	CNL Restatement of Postings at Current Rates (1995-1996), 11/4/96	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5252	C048512	C048524	CNL Restatement of Postings at Current Rates, 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5253	C048212	C048212	Voucher Input Sheer, Crude Oil Transactions for January 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5254	C048229	C048239	CNL General Ledger Posting Report, 1/2/97	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5255	C048213	C048228	CNL General Ledger Posting Report, 2/4/97	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5256	C048774	C048786	CNL General Ledger Posting Report, 2/28/97	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5257	C048240	C048258	CNL General Ledger Posting Report, 5/2/97	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5258	C048868	C048877	CNL General Ledger Posting Report, 5/26/97	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5259	C048836	C048847	CNL General Ledger Posting Report, 6/3/97	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5260	C048491	C048511	CNL General Ledger Posting Report, 7/2/97	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5261	C048525	C048539	CNL General Ledger Posting Report, 8/4/97	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5262	C048475	C048490	CNL General Ledger Posting Report, 9/1/97	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5263	C048373	C048388	CNL General Ledger Posting Report, 2/2/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5264	C048552	C048571	CNL General Ledger Posting Report, 3/3/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5265	C048540	C048551	CNL General Ledger Posting Report, 4/2/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5266	C048572	C048610	CNL General Ledger Posting Report, 5/4/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5267	C048389	C048404	CNL General Ledger Posting Report, 6/1/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5268	C048356	C048372	CNL General Ledger Posting Report, 7/1/1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5269	C048454	C048460	CNL General Ledger Posting Report, 8/3/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5270	C048461	C048474	CNL General Ledger Posting Report, 9/2/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5271	C048405	C048424	CNL General Ledger Posting Report, 10/2/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5272	C048148	C048167	CNL General Ledger Posting Report, 10/31/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5273	C048425	C048453	CNL General Ledger Posting Report, 12/1/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5274	C048168	C048194	CNL General Ledger Posting Report, 12/30/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5275	C048195	C048211	CNL General Ledger Posting Report, 1/26/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5276	C048611	C048622	CNL General Ledger Posting Report, 3/31/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5277	C048623	C048637	CNL General Ledger Posting Report, 3/1/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5278	C048787	C048818	CNL General Ledger Posting Report, 5/4/1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5279	C048299	C048316	CNL General Ledger Posting Report, 6/1/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5280	C048638	C048669	CNL General Ledger Posting Report, 7/29/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5281	C048317	C048339	CNL General Ledger Posting Report, 8/25/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5282	C048259	C048242	CNL General Ledger Posting Report, 9/30/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5283	C048285	C048298	Email from Chuck Frick, Chevron Products Company, International Logistics and Training with attached documents showing FOB Cargo Purchase from CNL, dated 10/4/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5284	C048750	C048773	CNL General Ledger Posting Report, 11/1/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5285	C048706	C048749	CNL General Ledger Posting Report, 12/2/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5286	C048670	C048705	CNL General Ledger Posting Report, 1/4/00	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5287	C14789	C14798	Intercompany Settlement, dated 11/30/95, entered January 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5288	C14799	C14835	Intercompany Settlement, dated 12/31/95, entered February 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5289	C14836	C14879	Intercompany Settlement, dated 1/31/96, entered March 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5290	C14880	C14902	Intercompany Settlement, dated 2/29/96, entered April 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5291	C14903	C14917	Intercompany Settlement, dated 3/31/96, entered May 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5292	C14918	C14984	Intercompany Settlement, dated 4/30/96, entered June 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5293	C14985	C15014	Intercompany Settlement, dated 5/31/96, entered July 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5294	C15015	C15066	Intercompany Settlement, dated 6/30/96, entered August 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5295	C15067	C15113	Intercompany Settlement, dated 7/31/96, entered September 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5296	C15068	C15069	Letter from Kuba to Steffinger and others dated 9/11/1996 re: Intercompany Settlements - September 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5297	C15114	C15167	Intercompany Settlement, dated 8/31/96, entered October 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5298	C15168	C15201	Intercompany Settlement, dated 9/30/96, entered November 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5299	C15202	C15254	Intercompany Settlement, dated 10/31/96, entered December 1996	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5300	C15255	C15287	Intercompany Settlement, dated 11/30/96, entered January 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5301	C15335	C15335	March 1997 Settlement of Intercompany Accounts Over \$1,000,000.00, dated 1/31/1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5302	C15288	C15332	Intercompany Settlement, dated 12/31/96, entered February 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5303	C15333	C15368	Intercompany Settlement, dated 1/31/97, entered March 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5304	C15369	C15425	Intercompany Settlement, dated 2/28/97, entered April 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5305	C15426	C15479	Intercompany Settlement, dated 3/31/97, entered May 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5306	C15480	C15535	Intercompany Settlement, dated 4/30/97, entered June 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5307	C15536	C15594	Intercompany Settlement, dated 5/31/97, entered July 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5308	C15595	C15642	Intercompany Settlement, dated 6/30/97, entered August 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5309	C15643	C15724	Intercompany Settlement, dated 7/31/97, entered September 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5310	C15725	C15782	Intercompany Settlement, dated 8/31/97, entered October 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5311	C15783	C15827	Intercompany Settlement, dated 9/30/97, entered November 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5312	C15828	C15901	Intercompany Settlement, dated 10/31/97, entered December 1997	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5313	C15902	C15955	Intercompany Settlement, dated 11/30/97, entered January 1998	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5314	C15956	C16001	Intercompany Settlement, dated 12/31/97, entered February 1998	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5315	C16002	C16066	Intercompany Settlement, dated 1/31/98, entered March 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5316	C16067	C16117	Intercompany Settlement, dated 2/28/98, entered April 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5317	C16118	C16175	Intercompany Settlement, dated 3/31/98, entered May 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5318	C16176	C16225	Intercompany Settlement, dated 4/30/98, entered June 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5319	C16226	C16274	Intercompany Settlement, dated 5/31/98, entered July 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5320	C16275	C16331	Intercompany Settlement, dated 6/30/98, entered August 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5321	C16332	C16377	Intercompany Settlement, dated 7/31/98, entered September 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5322	C16378	C16431	Intercompany Settlement, dated 8/31/98, entered October 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5323	C16432	C16473	Intercompany Settlement, dated 9/30/98, entered November 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5324	C16474	C16565	Intercompany Settlement, dated 10/31/98, entered December 1998	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5325	C16566	C16641	Intercompany Settlement, dated 11/30/98, entered January 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5326	C16642	C16689	Intercompany Settlement, dated 12/31/98, entered February 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5327	C16690	C16729	Intercompany Settlement, dated 1/31/99, entered March 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5328	C16730	C16813	Intercompany Settlement, dated 2/28/99, entered April 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5329	C16814	C16905	Intercompany Settlement, dated 3/31/99, entered May 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5330	C16863	C16863	Letter to Cornwell and others dated 5/10/1999 re: Intercompany Settlement May 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5331	C16906	C16954	Intercompany Settlement, dated 4/30/99, entered June 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5332	C16955	C17003	Intercompany Settlement, dated 5/31/99, entered July 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5333	C17004	C17056	Intercompany Settlement, dated 6/30/99, entered August 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5334	C17057	C17103	Intercompany Settlement, dated 7/31/99, entered September 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5335	C17105	C17198	Intercompany Settlement, dated 8/31/99, entered October 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5336	C17199	C17266	Intercompany Settlement, dated 9/30/99, entered November 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5337	C17267	C17317	Intercompany Settlement, dated 10/31/99, entered December 1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5338	C13571	C13624	Realignment Entries January 1998, dated 1/20/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5339	C13625	C13671	Realignment Entries February 1998, dated 2/18/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5340	C13672	C13718	Realignment Entries March 1998, dated 3/17/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5341	C13719	C13765	Realignment Entries April 1998, dated 4/15/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5342	C13766	C13814	Realignment Entries May 1998, dated 5/19/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5343	C13815	C13865	Realignment Entries June 1998, dated 6/15/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5344	C13866	C13905	Realignment Entries July 1998, dated 7/17/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5345	C13906	C13942	Realignment Entries August 1998, dated 8/17/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5346	C13943	C13979	Realignment Entries September 1998, dated 9/16/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5347	C13980	C14018	Realignment Entries October 1998, dated 10/15/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5348	C14019	C14113	Realignment Entries November 1998, dated 11/17/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5349	C14114	C14147	Realignment Entries December 1998, dated 12/16/98	Exhibit is irrelevant, unduly prejudicial, confusing and would cause undue delay. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5350	C14148	C14188	Realignment Entries January 1999, dated 1/19/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5351	C14189	C14224	Realignment Entries February 1999, dated 2/17/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5352	C14225	C14263	Realignment Entries March 1999, dated 3/16/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5353	C14264	C14303	Realignment Entries April 1999, dated 4/16/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5354	C14304	C14389	Realignment Entries May 1999, dated 5/18/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5355	C14390	C14459	Realignment Entries June 1999, dated 6/16/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5356	C14460	C14494	Realignment Entries July 1999, dated 7/19/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5357	C17094	C17095	Chart showing Intercompany Balances before and after Realignment, dated 7/31/1999	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5358	C14495	C14531	Realignment Entries August 1999, dated 8/17/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5359	C14532	C14568	Realignment Entries September 1999, dated 9/17/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5360	C14569	C14606	Realignment Entries October 1999, dated 10/15/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5361	C14607	C14685	Realignment Entries November 1999, dated 11/15/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one “relevant to the plaintiff’s claim of wrongdoing” – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5362	C14686	C14718	Realignment Entries December 1999, dated 12/15/99	Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. <i>Bowoto</i> , 312 F. Supp. 2d at 1240 (quoting <i>Phoenix Canada Oil Co. v. Texaco, Inc.</i> , 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See <i>Sonora Diamond Corp. v. Super. Ct.</i> , 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); <i>U.S. v. Bestfoods</i> , 524 U.S. 51, 71-72 (1998); see also <i>Calvert v. Huckins</i> , 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5363	C109285	C109628	Chevron Texaco Drilling Activity Report, multiple, date range March '97-August '98	FRE 401, 403		
5364	C17796	C17797	ChevronTexaco, Drilling Activity Report, dated 5/25/98	FRE 401, 403		
5365	C17780	C17781	ChevronTexaco, Drilling Activity Report, dated 5/25- 26/1998	FRE 401, 403		
5366	C17798	C17787	ChevronTexaco, Drilling Activity Report, dated 5/26/98	FRE 401, 403		
5367	C17783	C17783	ChevronTexaco, Drilling Activity Report, dated 5/27/98	FRE 401, 403		
5368	C17786	C17786	ChevronTexaco, Daily Completion/WO Report, dated 5/28/98	FRE 401, 403		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5369	C17785	C17785	ChevronTexaco, Daily Completion/WO Report, dated 5/28/98	FRE 401, 403		
5370	C17802	C17802	ChevronTexaco, Drilling Activity Report, dated 5/28/98	FRE 401, 403		
5371	C17804	C17804	ChevronTexaco, Drilling Activity Report, dated 5/29/98	FRE 401, 403		
5372	C17836	C17874	COPI Weekly Drilling Report - Distribution List, Week of 5/26/98 - 6/1/98 re: weekly updates and summaries of each drilling location	Dupe of 171 (Harrison). FRE 401, 403		
5373	C17919	C17951	COPI Weekly Drilling Report - Distribution List, Week of 12/28/98 - 1/3/99 re: weekly updates and summaries of each drilling location	FRE 401, 403		
5374	C17779	C17829	Drilling Activity Report, dated 5/25/1998 - 1/12/1999	Partial Dupe of 169 (Harrison). FRE 401, 403		
5375	C17892	C17918	ChevronTexaco Operations Summary Report dated 4/15/1998 - 5/2/2000, re: cumulative costs and 24hr summaries			
5376	C17875	C17891	ChevronTexaco Daily Drilling Report, dated 10/8/2002 re: Operator status of operations	FRE 401, 403		
5377	B00653	B00654	Letter from Omotoya and others to The Military Administrator and others dated 4/14/1998 re: Situational Report: Oil Producing Communities and the Oil Companies Exploiting the Area	FRE 802		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5378	B00656	B00656	Letter from Ofuonyebi to The Coordinator/Secretary dated 4/23/1998 re: re-request for appointment	FRE 802		
5379	C17952	C17969	North Offshore Morning Report, dated May 20, 1998 - June 6, 1998	Dupe of 1091 (Hervey), 266 (Mitchell) & 168 (Harrison). No objection to 5/24 to 5/31; FRE 401, 403 as to 5/20 to 5/23, 6/1 to 6/6		
5380	C20313	C20317	Email from NIGEC Security Coordinator to Uwaka and others dated 6/1/1998 re: Invasion of CBL 101/Parabe Platform, with attached Letter from Neku to Uwaka dated 6/2/1998			
5381	C19840	C19841	Email from Lorenz to Houghton and others, dated 7/10/1998, re: Update on Nigerian Situation, with email chain	Email from Omole is hearsay. FRE 802. Email does not relate to Parabe and Nigerian political situation in July 1998 is irrelevant and misleading. FRE 401-403.		
5382	C0324	C0326	Andrew O. Ogedegbe's Declaration, dated 7/24/1999	FRE 802		
5383	C0467	C0468	Statement by Chevron Nigeria Limited on Invasion of NNPC/Chevron Offshore Parabe Production Platform, dated May 28, 1998			
5384	C0463	C0465	Email from Lorenz to Bates and others re: Parabe Statement and Wire Stories, dated May 28, 1998, with attached statement on Parabe to use for the media	Articles are hearsay. FRE 802. Irrelevant to the extent statement was not distributed. Cumulative of other evidence. FRE 401-403		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5385	C0458	C0459	Email from Lorenz to Schull and others re: Parabe Wires, dated May 29, 1998, with attached NewsWare article titled "Chevron restarting Nigeria Parabe Platform Friday" and "Protest Shuts in Chevron Production in Nigeria" dated May 29, 1998	Articles are hearsay as are statements regarding summary of articles. FRE 802. Cumulative of other evidence. FRE 401-403		
5386	C0901	C0902	The Parabe Crisis - The Facts, dated June 5, 1998, letter authored by Kirkland	Cumulative of other evidence. FRE 401-403		
5387	C0061	C0067	Letter from Kirkland to Manby re: The Parabe Incident - The Facts, dated June 29, 1998	Letter has multiple levels of hearsay (including Malumi's statements). That HRW inquired about the Parabe incident is irrelevant and the prejudice outweighs the potential probative value. FRE 401-403, 802		
5388	C19869	C19871	Nigeria Media Statements, dated July 30, 1998	All statements within the document are irrelevant in that they do not relate to Parabe. The statement associated with Parabe is also irrelevant because there is no evidence that this statement was ever published in the media. FRE 401-403. Document is hearsay, as are the statements attributed to Abubakar. FRE 802		
5389	C0276	C0276	The Guardian article titled "Chevron refutes alleged environmental devastation in Ondo" dated August 4, 1998	Multiple levels of hearsay (i.e., Malumi's statements); prejudice outweighs probative value; cumulative of other evidence and testimony. FRE 401-403, 802		
5390	C19000	C19001	Email from Lorenz to Lavington re: Congressional Human Rights Caucus response letter, dated August 27, 1998, with attached letter from Cavanaugh to Congressional Human Rights Caucus	Any probative value is far outweighed by the potential prejudice of the congressional investigation. And the fact that a congressional investigation occurred is irrelevant to what happened at Parabe or to plaintiffs' agency/ratification theories. To the extent the document contains statements about Parabe, they are cumulative of other statements. FRE 401-403		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5391	C17375	C17377	Transcript of Berkeley Radio Station KPFK-FM Radio discussion between Brown, Libby, and Flanders, dated September 30, 1998	Transcript is hearsay. Libby lacks personal knowledge. FRE 602, 802. Incomplete document. Prejudice outweighs possible probative value, if any. Cumulative of other evidence. FRE 401-403		
5392	C19037	C19052	Email from Lorenz to Omole, etc., attaching transcript of Democracy Now KPFK Radio discussion dated September 30, 1998	Entire interview is hearsay. FRE 802. Statements by Sola are irrelevant to plaintiffs' ratification theory because Sola is a CNL employee, not an employee of defendants. FRE 401-403. Cumulative of 222 & 1020. FRE 401-403		
5393	C0429	C0430	Reuters News Service article titled "Rights group prepares to sue Chevron over Nigeria deaths" by Tony McAuley, dated October 12, 1998	With the exception of the quotes attributed to Mike Libbey ("our reading . . . agency representative," and "we negotiated . . . on either side") the article is hearsay. The statements attributed to Omole are also hearsay because they are from the Pacifica broadcast and the reporter's summary of the Pacifica interview is hearsay. FRE 802		
5394	C19058	C19059	Email from Lorenz to Yeager and others re: Parabe Web site statement, dated October 15, 1998, with attached Parabe Web site statement			
5395	C19004	C19004	Email from Lorenz to Perez dated 10/19/98, with attached proposed letter re: Concern over Chevron's Parabe facilities in Nigeria	Cumulative of other evidence. Reference to protest letters is prejudicial. Draft letter is misleading. FRE 401-403		
5396	C19527	C19539	Email from Lorenz to Omole and others re: Corporate Watch Web site re: Chevron and Nigeria dated November 11, 1998, with numerous attached articles on Chevron's role in human rights abuses	The newspaper articles are inadmissible hearsay not based on personal knowledge. FRE 602, 802. The threat of the lawsuit is a waste of time because the jury already knows there is a lawsuit and it is not probative of any issue in the litigation (C19530). FRE 401-403 FRE 802. Prejudicial and misleading; to the extent there is information about Parabe it is cumulative of other evidence. FRE 401-403		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5397	C20031	C20037	Email from Lorenz to Lavington re: Sola, dated November 17, 1998, with attached "Current African issues Nigeria Parabe Incident: Suggested Responses to Media"	Lorenz's statements regarding Ken Howe are hearsay. FRE 802. Attachment is irrelevant and misleading because there is no evidence that the talking points were ever addressed or distributed to the public. FRE 401-403.		
5398	C0434	C0435	San Francisco Chronicle article titled "Human Rights Group Investigates Chevron," dated November 19, 1998	With the exception of the quotes attributed to Tom Schull ("a very, very difficult situation," and "in the Niger Delta . . . government," and "machetes, clubs and knives.") the article is hearsay. FRE 802		
5399	C0402	C0403	Employee communication on go.chevron.com, entitled "Nigeria Update," dated November 20, 1998, describing Parabe incident			
5400	C19647	C19647	Chevron's Statement Regarding Seizure of Nigerian Parabe Offshore Platform, dated November 20, 1998			
5401	C19640	C19461	Letter to the Editor, San Francisco Chronicle, dated November 23, 1998	Draft letter is irrelevant and misleading. Cumulative of other evidence. FRE 401-403		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5402	C20061	C20063	Email from Lorenz to Omole and others re: Nigeria articles- NYT & DJ, dated November 23, 1998, with attached article entitled, We are abused and exploited / Spread of unrest across oil-rich area poses risk to Nigeria's stability" by Normitsu Onishi, dated November 22, 1998 and Dow Jones Energy Service article titled "Chevron Details Nigeria Oil Field Incident Amid Protests" by Champion Walsh, dated November 20, 1998	Articles are hearsay as are summaries of a Chevron statement. FRE 802. Reference to protest and shareholder resolution is prejudicial. Information regarding Ijaw unrest is irrelevant and misleading. To the extent the document contains information about Parabe it is cumulative of other evidence. FRE 401-403		
5403	C19019	C19022	Chevron's letter response to citizen letter about Parabe incident, from Caccamo to Dungan, dated December 1, 1998	Letter from Mr. Dungan (at C1921-22) is hearsay and prejudicial. FRE 401-403, 802		
5404	C19485	C19491	Email from Lorenz to Lavington re: Chevron's Killing Fields in Nigeria, dated December 2, 1998, with attached The Nation Article "Nigeria: Drilling and Killing" by Amy Goodman and Jeremy Scahill, dated November 16, 1998	Duplicative of exhibit 5424, and defendants incorporate objections stated therein. Letters from citizens to Chevweb are hearsay, prejudicial and irrelevant. FRE 802		
5405	C17350	C17351	Letter to the Editor, San Francisco Bay Guardian, dated December 3, 1998, signed by Kirkland	Cumulative of other evidence. FRE 401-403		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5406	C17493	C17494	Report on Human Rights Watch Report - Chevron's Position, dated February 23, 1999, REDACTED	This report was made in response to HRW's report on Opia/Ikenyan and is inadmissible unless plaintiffs agree to respond to discovery about why the Opia/Ikenyan plaintiffs dismissed their claims. References to Opia/Ikenyan are prejudicial and misleading. To the extent there are any statements relating specifically to Parabe, they are cumulative of other statements made in deposition and documents that do not relate to Opia/Ikenyan. FRE 401-403.		
5407	C19159	C19209	Tape Transcription of KPFA Pacifica Radio Program, "Democracy Now," dated February 24, 1999, REDACTED	With the exception of the statements from Libbey, the transcript is hearsay. FRE 802. C19159-179 is irrelevant and has no relation to any of plaintiffs' claims. FRE 401-403. Discussion concerning Opia/Ikenyan and CNL (C19179-C19209) is prejudicial and misleading, including all statements by Libbey, which are in response to questions/discussions concerning Opia/Ikenyan. FRE 401-403		
5408	C19148	C19150	Email from Lorenz to Haastrup and others re: LAT: Oil Firms Accused in Nigerian Abuses Africa, dated February 24, 1999, with attached LA Times article titled "Oil Firms Accused in Nigerian Abuses Africa: U.S. based group says multinationals have abetted human rights violations by failing to protest them" by Ann M. Simmons, dated February 24, 1999, REDACTED	Article and Gorell's statements are responsive to HRW report on Opia/Ikenyan so document is prejudicial and misleading. FRE 401-403. Article is hearsay. FRE 802		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5409	C20247	C20250	Human Rights Watch Report - Chevron's Position [Approved for use in responding to media inquiries, although comments/edits still seen on document], dated March 1, 1999, sent by Golon to Chevron employees considering doing article for Chevron Now, REDACTED	Statements about what Mike and Karen are considering for Chevron Now are hearsay. FRE 802. Attachment is irrelevant and misleading because there is no evidence that it was distributed outside of Chevron. Statement is a response to HRW and concerns Opia/Ikenyan and is therefore prejudicial and misleading. FRE 401-403.		
5410	C20495	C20496	Parabe Incident May 25 -May 28, 1998, REDACTED	Statement about Opia/Ikenyan is prejudicial and misleading. FRE 401-403. Document is incomplete. FRE 106		
5411	C20492	C20494	Letter from Kirkland to Gilman and others re: Kucinich letter, dated March 13, 1999, REDACTED	The draft letter is irrelevant and evidence relating to the congressional investigation is prejudicial and misleading. The investigation was done in reaction to Opia/Ikenyan. FRE 401-403. Statements about the content of Kucinich's letter and the investigation are hearsay. FRE 802		
5412	C19261	C19264	Email from Lorenz to Gorell dated 3/15/1999 re: Meeting with Coalition, and report on Meeting with Coalition by Gorell, dated 3/5/1999	Gorell's recount of meeting with coalition is hearsay. FRE 802. That there was a meeting with coalition members is irrelevant and prejudicial. The coalition addressed many topics that are irrelevant and prejudicial, including Opia/Ikenyan and the environment. FRE 401-403		
5413	C20232	C20236	Email from Viegas to Libbey and others re: More on Nigeria, dated March 16, 1999, with attached Africa News Service articles entitled, "US Congress Probes Chevron, Mobil" and "Chevron's Role in Nigeria Violence Prompts Call for Investigation," REDACTED	Articles are hearsay. FRE 802. That there was a congressional investigation is irrelevant, misleading and prejudicial. FRE 401-403. There are impermissible references to Opia/Ikenyan which is prejudicial, misleading and irrelevant. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5414	C19253	C19254	Parabe Incident May 25 -May 28, 1998, REDACTED	Impermissible reference to Opia/Ikenyan that is misleading, prejudicial and violates the Court's order that plaintiffs are not permitted to mention Opia/Ikenyan absent responding to discovery as to why those plaintiffs dismissed their claims. FRE 401-403. To the extent this document contains information about Parabe, it is duplicative of other exhibits and evidence and defendants incorporate their objections to those duplicative exhibits here. FRE 401-403		
5415	C19251	C19256	Email from Lorenz to Lifa and others re: Congress investigation of Chevron activities in Nigeria, dated March 17, 1999, with attached Parabe Incident Statements and "Chevron and Nigeria Issues," REDACTED	Document is incomplete. FRE 106. Emails concerning a radio interview of which there is no evidence that such interview occurred is irrelevant. FRE 401-403. Document concerns Opia/Ikenyan and congressional investigation so is misleading and prejudicial. FRE 401-403. Portion of the email from Mr. Lifa is hearsay. FRE 802		
5416	C0229	C0231	Punch Newspaper article titled "Niger Delta: Chevron refutes rights abuse charges," dated April 3, 1999, REDACTED	Multiple levels of hearsay (i.e., Malumi's statements); prejudice outweighs probative value; cumulative of other evidence and testimony; specific references to Opia/Ikenyan and HRW report which relates directly to Opia/Ikenyan. FRE 401-403, 802		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5417	C20210	C20218	Email from Gorell to Perez and others re: Tom Butt epistle cont., dated April 13, 1999, and email chain re: Chevron Killings in Nigeria, REDACTED	Entire document contains attachments that are all hearsay. Summary of statements attributed to Sola Omole and to Chevron in the Reuters article are hearsay (20216-17). FRE 802. Email exchange is irrelevant and misleading because it refers to the hearsay statements of a non-party and/or statements published on ERA's website. FRE 401-403. Hearsay statements are prejudicial and misleading and often irrelevant. There is also an impermissible reference to Opia/Ikenyan. FRE 401-403. The quote attributed to Libbey regarding the Spencer conversation by Reuters (C20217) is misleading and prejudicial because Libbey testified that the statement was taken out of context. FRE 401-403		
5418	C0431	C0432	Email from Lavington to Matzke and others re: WSJ - Nigerians' Suit Alleges Chevron backed Attacks That Violated Human Rights, dated May 28, 1999, with attached article, REDACTED	Article is hearsay. FRE 802. Cumulative of other evidence. Prejudice outweighs any probative value. FRE 401-403		
5419	C19433	C19434	Letter from Williams to Concerned Citizen, (e.g. Mark Brown) re: Letter expressing concern over Parabe, dated July 20, 1999	Document is irrelevant and misleading because there is no evidence that the unsigned letter was ever distributed to the public. FRE 401-403. Draft letter is hearsay. FRE 802		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5420	C0583	C0594	Excerpt from Chevron's web site printed on 9/26/00 entitled, "Chevron Nigeria Commitment," "Chevron's Statement Regarding Seizure of Nigerian Parabe Offshore Platform," "Chevron's Operations in Nigeria," "Chevron Community Activities in Nigeria," and "Protecting the Environment"	Website statements are irrelevant to the extent they do not involve the Parabe incident (only 586 concerns statements about Parabe). FRE 401-403. There is an impermissible and prejudicial reference to Opia/Ikenyan, at 584, so the entire paragraph starting with "It has been inaccurately reported . . . " to "Chevron has no involvement whatsoever in this activity" should be excluded. FRE 401-403. Reference to the cost of CNL's gas-utilization project, oil and gas-to-liquids production data and pipeline projects (587) are irrelevant and the probative value (if any) is outweighed by the possible prejudice. FRE 401-403. Reference to environmental protections (594) is irrelevant (pursuant to the Court's in limine order excluding certain environmental evidence) and will be misleading and prejudicial. FRE 401-403		
5421	C0075	C0075	Letter from Tudor to Managing Director, Chevron UK Ltd dated 7/16/1998 re: Chevron's Raid on Peaceful Protesters in Nigeria, In Which Two People were Killed and 30 injured	Multiple levels of hearsay; prejudice outweighs any potential probative value. FRE 401-403, 802		
5422	C20010	C20012	Email from Lorenz to Haastrup and others dated October 30, 1998, re: Nigeria Q & A's, with attached memo re: Current African Issues, Nigeria Parabe incident, Suggested Responses to Media	Document is incomplete. FRE 106. Lorenz' statement that Schull, Omole and Perez reviewed the attachment and that it was provided to Kirkland and Matzke is hearsay. FRE 802		
5423	C0386	C0386	Email from Lavington to Loo dated 11/28/98 with attached draft letter to the editor, to be delivered to San Francisco Chronicle today	Draft letter is hearsay and misleading because no evidence it was distributed outside of Chevron. FRE 401-403, 802.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5424	C19479	C19480	Email from ChevWeb to Howard, dated 12/1/1998, re: Chevron's Killing Fields in Nigeria,	Document is incomplete. FRE 106. Letter is cumulative of other evidence and responding to a hearsay email. FRE 401-403, 802		
5425	C19075	C19078	Email from Lorenz to Gorell and others re: Chevron Ecofile - Nigeria Interview Request, dated 12/14/1998	Irrelevant because Schull does not recall the reference interview ever occurring. FRE 401-403.		
5426	C20162	C20165	Email from Lorenz to Lavington, dated 1/27/1999, re: Question, with email chain	Email correspondence about drilling and killing fliers at Alcanese high school are irrelevant and prejudicial. FRE 401-403. Emails from Gary, Mike, Stan and Noel are all hearsay. FRE 802.		
5427	C19408	C19411	Email from Lorenz to Omole and others, dated 2/3/1999, re: Stop Killing Protestors, with email chain	Letters from citizens to Chevweb are hearsay, as is the statement on Chevweb. FRE 802. Document is misleading and prejudicial because response relates to Opia/Ikenyan. FRE 401-403		
5428	C19327	C19327	Email from Lorenz to Omole and others dated 2/11/1999 re: Thanks re Web pages	Email relates to Opia/Ikenyan (reference to boats used to attack villages) and is irrelevant, prejudicial and misleading. FRE 401-403.		
5429	B00313	B00314	Human Rights Watch press release dated 2/23/99, "Oil Companies Complicit in Nigerian Abuses"	Irrelevant and prejudicial because press release relates to Opia/Ikenyan and is after Parabe; is double hearsay. FRE 401-403, 802		
5430	C20239	C20241	Email from Gorell to Perez and others, dated 3/5/1999, re: Meeting with Coalition	Exhibit is duplicative of 5412. Gorell's recount of meeting with coalition is hearsay. FRE 802. That there was a meeting with coalition members is irrelevant and prejudicial. The coalition addressed many topics that are irrelevant and prejudicial, including Opia/Ikenyan and the environment. FRE 401-403		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5431	C17495	C17498	Fax from Golon to Hayden and others dated 3/10/1999 re: Kucinich release, and press release re: New information about US Oil Company's Role in Escalating Violence in Nigeria Prompts Call for Congressional Investigation, dated 3/9/1999, REDACTED	The attached press release is hearsay. FRE 802. To the extent the press is admissible the probative value is far outweighed by the prejudice of a congressional investigation and the information about Opia/Ikenyan which plaintiffs are prohibited from using absent responding to discovery. The same applies for the fax cover sheet which specifically references the "Kucinich release." FRE 401-403		
5432	C19249	C19250	Email from Lorenz to Gorell and others, dated 3/17/1999, re: CURRENT ISSUES WEB PAGE, with email chain	The email correspondence concerns a comparison of statements concerning Opai/Ikenyan and Parabe so is misleading and prejudicial. FRE 401-403		
5433	C0439	C0441	Email from Perez to O'Reilly, dated 3/17/1999, re: More on Nigeria, with email chain and attached African News Service article titled "US Congress Probes Chevron, Mobile," REDACTED	Article attached to Viegas email is hearsay and there are no statements attributed to an identified Chevron employee. FRE 802. To the extent the article is admissible the probative value is far outweighed by the prejudice of a congressional investigation and the information about Opia/Ikenyan which plaintiffs are prohibited from using absent responding to discovery. FRE 401-403		
5434	C19215	C19224	Email chain dated 3/22/99 re: Letter from Kirkland to Manby re: Human Rights Watch Report, with attached draft letter, Parabe statement, etc., REDACTED	Letter and email correspondence concerns response to HRW report which is related to Opia/Ikenyan and is therefore irrelevant, prejudicial and misleading. The letter and email correspondence does not contain any substantive comments on Parabe, with the exception of the statement appearing on C19223, which is cumulative of other evidence. FRE 401-403		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5435	C19024	C19025	Email from Lorenz to Ilevbare and others dated 2/12/1999 re: re-use of chevron vehicles by law enforcement personnel, REDACTED	Emails concern Opia/Ikenyan media response and are therefore irrelevant, misleading and prejudicial. Inquiry from Frank (C19025) is hearsay. FRE 401-403, 802		
5436	C19322	C19326	Email from Lorenz to Haastrup and others dated 2/23/1999 re: Encounter with AFP Reporter, REDACTED	Email exchange relates to Opia/Ikenyan and HRW report and is prejudicial, misleading and irrelevant. FRE 401-403. Emails from Mr. Haastrup are hearsay. FRE 802		
5437	C20421	C20423	Email from Connor to Taylor etc., dated 1/14/99, re: FW: Security./Comm. Rel. Committee mtg.3/12/98	Discussions regarding CNL community/security in December 1998 and January 1999 do not relate to Parabe and are irrelevant to plaintiffs' liability theories. FRE 401-403. Attachments (C20422-23) from December 12, 1998 Security/Community Relations meeting is hearsay. FRE 802. Email exchange among CNL employees is hearsay. FRE 802.		
5438	C20442	C20442	Email from Connor to Macleod and others dated 2/4/1999 re: Acquisition of patrol boats for CNL, responding to email from Macleod to Neves and others	Document is incomplete. FRE 106. Discussions regarding CNL's purchase of boats in February 1999 is irrelevant and misleading. Boats were not even used at Parabe. FRE 401-403. Discussions regarding the security review and what was said during the review is hearsay, irrelevant and relates to subsequent remedial measures. FRE 401-403, 407		
5439	C20728	C20731	Email from Connor to Kirkland and others dated 3/24/1999 re: Security Meeting March 24th Lagos, with attached Chart with 3 columns labeled Security Report, CNL Responses and Action required by	Email and attachment dated March 1999 unrelated to Parabe is irrelevant, waste of time. FRE 401-403, 407.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5440	C19936	C19936	Email from Lorenz to Schull and others dated 10/15/1998 re: Escravos Operations Area Update	Email dated 10/15/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
5441	C19937	C19938	Email from Lorenz to Gorell and others dated 10/16/1998 re: Production Stoppage in NNPC/Chevron Swamp Locations	Email dated 10/16/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
5442	C19939	C19940	Email from Lorenz to Haastrup and others re: Dow Jones Wire Story, Nigeria dated October 19, 1998, with attached Dow Jones News Service Article titled "Chevron Nigeria -3: Hostage Takers Demanding Ransom" by Onyema Ugochukwu and Sarah Moore, dated October 16, 1998	Attached article is hearsay. FRE 802. News reports concerning October 1998 hostage situation is irrelevant to Parabe and misleading. FRE 401-403. Lorenz's comments on what Tom said is hearsay. FRE 802.		
5443	C19941	C19943	Email from Lorenz to Libbey and others dated 10/19/1998 re: Hostages held by Ijaws	Email dated 10/19/98 re hostage-taking incident unrelated to Parabe is irrelevant, waste of time and hearsay. FRE 401-403, 802.		
5444	C19946	C19947	Email from Lorenz to Houghton dated 10/19/1998 re: Update on Security in Escravos	Email dated 10/19/98 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
5445	C23530	C23532	Email from Loo to Derr and others dated 6/3/1999 re: Situation Report on Hostilities Among Communities in the Niger Delta	Email and attachment dated 6/3/99 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
5446	C23528	C23528	Email from Lorenz to Lavington dated 6/7/1999 re: Situation Report on Hostilities Among Communities in the Niger Delta	Partial email string dated 6/7/99 unrelated to Parabe is irrelevant, waste of time. FRE 106, 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5447	C20175	C20175	Email from Lorenz to Omole and others dated 2/16/1999 re: Human Rights Watch Report Media Statement	Statement is in response to HRW report, was made after Parabe and does not contain statements about Parabe so is irrelevant, misleading and prejudicial. FRE 401-403. Comments on what HRW report and other newspaper companies said is hearsay. FRE 802		
5448	C0417	C0420	Chevron Corporation Notice of Annual Meeting of Stockholders and Proxy Statement, dated 4/30/1997	Proxy Statement concerning 1997 stockholder proposal to develop country guidelines is irrelevant (it concerns Ken Saro-Wiwa, Nigerian labor standards and statements of Mandela) and is hearsay. Any probative value is far outweighed by potential prejudice. FRE 401-403, 802		
5449	C0412	C0416	Letter from Beebe to Matzke and others dated 11/23/1998 re: Nigeria Report Stockholder Proposal, with attached letter from Coleman to Derr dated 11/13/1998 re: Resolution for 1999 Annual Shareholder Meeting	Stockholder proposal is irrelevant to the events at Parabe. To the extent Chevron's response to the proposal relates to plaintiffs' ratification theory, the potential prejudice of such a proposal far outweighs the benefit of any probative value. The proposal is hearsay. FRE 401-403, 802		
5450	C17336	C17337	Letter from Neuberger Berman, LLC to Derr dated 12/15/98 re: shareholder resolution on human rights commitment in Nigeria	Letter is hearsay. Moreover, the shareholder resolution is irrelevant and prejudicial. FRE 401-403, 802		
5451	C17490	C17492	Stockholder Proposal on Code of Business Conduct, dated 2/23/99	1999 shareholder proposal is hearsay. It is also irrelevant and any potential probative value is far outweighed by potential prejudice. FRE 401-403, 802		
5452	C036331	C036332	Handwritten notes dated 2/9/1995 re: security incident			
5453	C036393	C036393	Handwritten note dated 4/5/1996	Double Hearsay. FRE 802.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5454	C31709	C31709	Letter from Uwaka to The Commissioner of Police dated 4/16/1996 re: Official Invitation			
5455	C33095	C33095	Letter from Uwaka to The Commissioner of Police Delta Police Command dated 5/2/1996 re: Request for Mobile Police			
5456	C036409	C036409	Handwritten note dated 10/21/1996	Double Hearsay. FRE 802.		
5457	C040724	C040724	Email from Neku to Uwaka and others dated 4/15/1997 re: Sitrep at noon - 15 Mobiles Arrived	Hearsay. FRE 802		
5458	C040727	C040727	Email from Neku to Uwaka and others dated 5/1/1997 re: Sitrep 24hrs	Hearsay. FRE 802		
5459	C040615	C040616	Email from Neku to Uwaka and others dated 5/4/1997 re: Situation Report	Hearsay. FRE 802		
5460	C25626	C25627	Report by Momoh to Uwaka dated 11/22/1997 re: Incident Report Hostage Situation in Awoye and Molutehin Communities			
5461	B00111	B00113	Letter from Manby to Kirkland dated 1/23/98 re: Incidents Involving Chevron & GSF	Letter is double hearsay because Manby's information comes from outside sources (i.e., Opuama incident). That HRW investigated acts in the Niger Delta is irrelevant to Parabe and the possible prejudice outweighs any potential probative value. FRE 401-403, 802		
5462	C28906	C28914	Letter from Kirkland to Manby dated 3/11/1998 re: Letter dated January 23, 1998	All references to Opuama should be excluded because the prejudice far outweighs the probative value. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5463	C039661	C039661	Email from NIGEC Drilling Supt to NIGEC Security Coordinator and others dated 9/25/1998 re: Security Concerns	FRE 401, 403, 802		
5464	B00134	B00134	Letter from Manby to Kirkland dated 12/1/98	Letter is hearsay. That HRW inquired about the Parabe incident is irrelevant and the prejudice outweighs the potential probative value. FRE 401-403, 802		
5465	C036469	C036469	Handwritten Note dated 1/12/1999	FRE 401, 403, 802, 901		
5466	C036155	C036163	Security Personnel in Escravos Ops Area, dated 2/17/1999	Document dated Feb. 1999 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
5467	C040598	C040598	Email from Neku to Uwaka and others re: Sitrep for the last 24 hours	Undated email unrelated to Parabe is irrelevant, waste of time, prejudicial and hearsay. FRE 401-403, 802.		
5468	C036263	C036264	Email from Neku to Uwaka and others re: Supply of Ten(10) Mobile Policemen to CNL	Email dated March 1999 unrelated to Parabe is irrelevant, waste of time and hearsay. FRE 401-403, 802.		
5469	K11528	K11528	Article, "Town Pays in blood for seeking share of oil riches," dated 9/8/90, by Chris McGreal	Defendants incorporate their objections to Exhibit 5471		
5470	K11611	K11614	Report, "Amnesty International, Nigeria: A summary of Human Rights Concerns in 1991," dated March 1992	Defendants incorporate their objections to Exhibit 5471		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5471	K11583	K11583	Article, "Ogonis tackle oil firms today," dated 1/4/93, by Evuns Osi and Port Harcourt	Defendants do not have a copy of this exhibit because it is from another litigation and plaintiffs have not provided their proposed trial exhibits. Defendants reserve all rights to object. The objections are based on the document description. The discovery materials from the <i>Wiwa</i> litigation were not produced to defendants in this litigation, are prejudicial, misleading, irrelevant and should be excluded. FRE 401-403; <i>Wolk v. Green</i> , 2008 W.L. 298757, at *3 (precluding documents at trial not produced during discovery); <i>see also Pfingston v. Ronan Engineering Co.</i> , 284 F.3d 999, 1005 (9th Cir. 2002) (when party can show prejudice/unfair surprise as result of failure to disclose information in discovery, district court can properly bar reliance on its use in summary judgment); <i>Cambridge Electronics Corp. v. MGA Electronics, Inc.</i> , 227 F.R.D. 313, 323-24 (C.D. Cal. 2004) (same and noting "burden of showing harmlessness [of having failed to provide discovery] or substantial justification rests squarely on plaintiff".) Article is hearsay. FRE 802		
5472	K11579	K11579	Article, "Ogonis scar oil producers" dated 1/7/93, by Evuns Osi and Port Harcourt	Defendants incorporate their objections to Exhibit 5471		
5473	KIOBEL 001368	KIOBEL 001368	Article, "Ameliorating the fury of oil producing communities," dated 2/1/93, w/ letters to the editor	Defendants incorporate their objections to Exhibit 5471		
5474	KIOBEL 001479	KIOBEL 001484	Article, "We Will Defend Our Oil With Our Blood," dated 2/3/1993	Defendants incorporate their objections to Exhibit 5471		
5475	K11655	K11655	Article, "Oil Communities and Social Justice, dated 3/26/93, by Nwosu	Defendants incorporate their objections to Exhibit 5471		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5476	KIOBEL 001392	KIOBEL 001392	Article, "Oil of Sorrow," dated 4/5/93, by Dayo Omotoso	Defendants incorporate their objections to Exhibit 5471		
5477	K02926	K02927	Article, "Soldiers Attack Ogonis," dated 5/5/93, by Chris Ikwanze	Defendants incorporate their objections to Exhibit 5471		
5478	KIOBEL 001386	KIOBEL 001386	Article, "Gunning for the Ogonis," dated 5/31/93, by Adegbenro Adebajo	Defendants incorporate their objections to Exhibit 5471		
5479	KIOBEL 000983	KIOBEL 000989	Article, "Death on a sea of oil," dated 10/4/93, by Ima Niboro	Defendants incorporate their objections to Exhibit 5471		
5480	KIOBEL 001584	KIOBEL 001595	Article, "This is Genocide," dated 1/32/94	Defendants incorporate their objections to Exhibit 5471		
5481	K11485	K11488	Article, "The Enugu," dated 4/3/94, by Ochereome Nnanna	Defendants incorporate their objections to Exhibit 5471		
5482	K11572	K11572	Article, "Oil communities advised against holding Nigeria to ransom," dated 4/5/1994, by Sunny Ogefere	Defendants incorporate their objections to Exhibit 5471		
5483	K11447	K11447	Article, "Help Save Our Land," dated 4/10/94, by Tinu Odugbemi	Defendants incorporate their objections to Exhibit 5471		
5484	K11456	K11456	Article, "Boom for some, doom for others," dated 4/18/94, by Ima Niboro	Defendants incorporate their objections to Exhibit 5471		
5485	K11463	K11464	Article, "Waiting for Komo," dated 4/18/94, by Newswatch	Defendants incorporate their objections to Exhibit 5471		
5486	K11457	K11462	Article, "On sinking ground," dated 4/18/94, by Steve Osuji	Defendants incorporate their objections to Exhibit 5471		
5487	E-MB 00850	E-MB 00851	Article, "Ogoni, Four Days of Brutality and Torture," date rang May-August 1994, by Oromo N. Douglas	Defendants incorporate their objections to Exhibit 5471		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5488			The Wall Street Journal article titled Slick Alliance: Shell's Nigerian Fields Produce Few Benefits For Region's Villagers - Despite Huge Oil Revenues, Firm and Government Neglect the Impoverished - How Troops Handle Protests" by Geraldine Brooks, dated May 28, 1999 - WITHDRAWN	Defendants incorporate their objections to Exhibit 5551		
5489	KIOBEL 001364	KIOBEL 001366	Article, "Slick Alliance: Shell's Nigerian Fields Produce Few Benefits For Region's Villagers" dated 5/6/94 by Geraldine Brooks	Defendants incorporate their objections to Exhibit 5471		
5490	KIOBEL 001381	KIOBEL 001382	Article, "U.S. Congressional caucus writes Abacha," dated 5/10/1994, by Lanre Soruke and Port Harcourt	Defendants incorporate their objections to Exhibit 5471		
5491	K02932	K02933	Article, "A growing crisis," dated 6/20/94, by Ima Niboro	Defendants incorporate their objections to Exhibit 5471		
5492	B2326	B2354	Greenpeace International Report entitled, "Shell-Shocked: The environmental and social costs of living with Shell in Nigeria," dated July 1994	Activities relating to Shell are irrelevant and prejudicial; pursuant to Court order the only possible relevant environmental evidence relates to motive and is from 1996-May 1998, within the limited geographic scope of Ilajeland; triple and double hearsay. FRE 401-403, 802		
5493	KIOBEL 001399	KIOBEL 001399	Article, "This is Conquest," dated 7/18/94, by Uche Maduemesi	Defendants incorporate their objections to Exhibit 5471		
5494	E-MB 01782	E-MB 01782	Article, "Sanitising Ogoniland" dated 7/21/94, by Ken Saro-Wiwa	Defendants incorporate their objections to Exhibit 5471		
5495	E-MB 01788	E-MB 01788	Article, "The Killing Field," dated 7/25/94, by Tomson Ajayeoba	Defendants incorporate their objections to Exhibit 5471		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5496	E-MB 01789	E-MB 01789	Article, "Nightmare of State Violence," dated 7/25/94, by Professor Claude Ake	Defendants incorporate their objections to Exhibit 5471		
5497	E-MB 01784	E-MB 01784	Article, "Terror in Ogoniland," dated 7/25/1994	Defendants incorporate their objections to Exhibit 5471		
5498			The Washington Post article titled "Amnesty Alleges Nigerian Abuses" dated 11/11/1994	Defendants incorporate their objections to Exhibit 5551		
5499			Amnesty International Report, "Nigeria: Military Government clampdown on oppression," dated 11/11/94	Defendants incorporate their objections to Exhibit 5551		
5500	E-MB 01932	E-MB 01932	Article, "Can the Ogonis get justice?," dated 1/1/95	Defendants incorporate their objections to Exhibit 5471		
5501	E-MB 01899	E-MB 01900	Article, "Born of Oil, buried in Oil," dated 1/4/95, by John Vidal	Defendants incorporate their objections to Exhibit 5471		
5502	K03312	K03316	Article, "Nigeria's 'Drilling Fields': Shell Oil's Role in Repression," dated 2/95, by Steve Kretzmann	Defendants incorporate their objections to Exhibit 5471		
5503	E-MB 01999	E-MB 01999	Article, "Mosop Vs Vangaurd," dated 2/9/95	Defendants incorporate their objections to Exhibit 5471		
5504	E-MB 02002	E-MB 02003	Article, "One Epic Case," dated 2/20/95, by Muyiwa Adekeye	Defendants incorporate their objections to Exhibit 5471		
5505	KIOBEL 001576	KIOBEL 001578	Cover page, The Masses: Special Edition	Defendants incorporate their objections to Exhibit 5471		
5506	KIOBEL 001576	KIOBEL 001578	Article, "I lied against Saro-Wiwa"	Defendants incorporate their objections to Exhibit 5471		
5507	E-MB 02029	E-MB 02029	Article, "Shadow Trials," dated 2/27/95, by Odia Ofeimun	Defendants incorporate their objections to Exhibit 5471		
5508	E-MB 01713	E-MB 01715	Statement of the Unpo Mission to Investigate the situation of the Ogoni (Nigeria) February 17 to 28, 1995, dated 3/3/95	Defendants incorporate their objections to Exhibit 5471		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5509	K11286	K11292	Human Rights Watch/Africa Report, "First Ever Testimony by Nigerian Soldiers On the Military Campaign in Ogonland," dated 3/27/95	Defendants incorporate their objections to Exhibit 5471		
5510	E-MB 02065	E-MB 02065	Article, "Nigeria Accused of a 2-Year War on Ethnic Group," dated 3/28/95, by Howard W. French	Defendants incorporate their objections to Exhibit 5471		
5511	K11298	K11299	Article, "A Nigerian Killing Field That's Also Rich in Oil," dated 3/29/95, by Howard W. French	Defendants incorporate their objections to Exhibit 5471		
5512	E-MB 02067	E-MB 02068	Article, "Events unfolding at the on-going trial of Ogoni leaders at the Special Tribunal for alleged murder have raised fears of possible miscarriage of justice," dated April 1995	Defendants incorporate their objections to Exhibit 5471		
5513	KIOBEL 002151	KIOBEL 002152	Article, "Danger Signal form the Junta," dated 4/10/95, by Dayo Ajigbotosho	Defendants incorporate their objections to Exhibit 5471		
5514	E-MB 02061	E-MB 02063	Article, "Heating Up," dated 5/27/95, by Muyiwa Adekeye	Defendants incorporate their objections to Exhibit 5471		
5515	KIOBEL 001387	KIOBEL 001387	Article, "Rooting for Brotherly Love," dated 6/5/95, by Ima Niboro	Defendants incorporate their objections to Exhibit 5471		
5516			Dow Jones International News article titled "Nigeria Work Boycott For Monday Election Anniversary" dated 6/11/1995	Defendants incorporate their objections to Exhibit 5551		
5517	B3858	B3903	Human Rights Watch/Africa Nigeria The Ogoni Crisis: A Case Study of Military Repression in Southeastern Nigeria dated July 1995	Irrelevant and prejudicial; report primarily relates to Shell's area of operation and in an area far from Ilajeland; multiple levels of hearsay. FRE 401-403, 802		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5518			Down Jones Newswires article titled "Shell Oil/Nigeria - 2: Shell says it "Played No Part"" dated 7/7/1995	Defendants incorporate their objections to Exhibit 5551		
5519	E-MB 02108	E-MB 02108	Article, "Renewed Tension in Ogoniland," dated 8/31/95, by Stepp Offi	Defendants incorporate their objections to Exhibit 5471		
5520	K00826	K00855	Amnesty International Report, "Nigeria: A Travesty of Justice: Secret treason trials and other concerns," dated 10/26/95	Defendants incorporate their objections to Exhibit 5471		
5521	K11348	K11348	Article, "Thorn in side of Nigeria general," dated 11/1/1995, by David Orr	Defendants incorporate their objections to Exhibit 5471		
5522	K11349	K11349	Article, "Disputed oil troubles waters of Niger delta," dated 11/1/95, by Cindy Shiner	Defendants incorporate their objections to Exhibit 5471		
5523	K11364	K11364	Article, "Ogoni chiefs exiled as Abacha sends in thousands of troops," dated 11/2/95, by Sam Kiley and Ross Tieman	Defendants incorporate their objections to Exhibit 5471		
5524	K11353	K11353	Article, "Steel-Willed playwright defies the generals," dated 11/2/95, by Karl Maier	Defendants incorporate their objections to Exhibit 5471		
5525			Associated Press article titled "U.S. Recalls Ambassador After Nigeria Executes Nine Activists dated 11/10/1995	Defendants incorporate their objections to Exhibit 5551		
5526			The New York Times article titled "Nigeria Executes Critic of Regime; Nations Protest" by Howard W. French dated 11/11/1995	Defendants incorporate their objections to Exhibit 5551		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5527			The New York Times article titled "At the U.N., Anger Over Executions" by Christopher S. Wren dated 11/11/1995	Defendants incorporate their objections to Exhibit 5551		
5528			The New York Times article titled "Rights Group Say Shell Oil Shares Blame" by Paul Lewis dated 11/11/1995	Defendants incorporate their objections to Exhibit 5551		
5529	E-MB 02213	E-MB 02217	Article, "Ogoni Tragedy," dated 11/13/95, by Sam Oluokoya	Defendants incorporate their objections to Exhibit 5471		
5530	K01251	K01251	Article, "The Oil Weapon," dated 11/17/95, by Rob Nixon	Defendants incorporate their objections to Exhibit 5471		
5531	E-MB 02219	E-MB 02225	Article, "Abacha's Revenge," dated 11/18/95, by Ima Niboro	Defendants incorporate their objections to Exhibit 5471		
5532	K01640	K01644	Cover page, The week, dated 11/20/95	Defendants incorporate their objections to Exhibit 5471		
5533	K01640	K01644	Article, "Journey to The Gallows," dated 11/20/95, by Kehinde Bamigbetan	Defendants incorporate their objections to Exhibit 5471		
5534	K01634	K01639	Article, "The Last Testament," dated 11/27/95, by Isaac Umunna	Defendants incorporate their objections to Exhibit 5471		
5535	KIOBEL 001541	KIOBEL 001548	Article, "The World Vs Abacha," dated 11/27/95, by Ima Niboro	Defendants incorporate their objections to Exhibit 5471		
5536	K01257	K01257	Article, "Shell Boldly Defends Its Role in Nigeria," dated 11/27/95, by Paul Beckett	Defendants incorporate their objections to Exhibit 5471		
5537	E-MB 00114	E-MB 00116	Article, "What Saro Wiwa Told Me," dated 11/20/95	Defendants incorporate their objections to Exhibit 5471		
5538	E-MB 02381	E-MB 02385	Article, "On The Death Of Ken Saro-Wiwa," dated 10/95-12/95, by Ken Saro-Wiwa	Defendants incorporate their objections to Exhibit 5471		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5539	K14665	K14668	Article, "Oil, Shell and Nigeria: Ken Saro-Wiwa Calls for a Boycott," dated 12/1/1995	Defendants incorporate their objections to Exhibit 5471		
5540	K02228	K02233	Article, "Aso Rock's Hasty Retreat," dated 12/11/95, by Obiora Nwosisi, Article, "Mandela Vows to Explode the Volcano Under Abacha," dated 12/11/95, by Cameron Duodu	Defendants incorporate their objections to Exhibit 5471		
5541	K02216	K02217	Article, "Red Card for the Dictator," dated 12/18/95, by Adegbenro Adebajo	Defendants incorporate their objections to Exhibit 5471		
5542	K01302	K01302	Article, "Unholy Alliance in Nigeria," dated 1/26/96, by Bob Herbert	Defendants incorporate their objections to Exhibit 5471		
5543	K03871	K03872	Article, "After Nigeria Represses, Shell Defends Its Record," dated 2/11/96 by Paul Lewis	Defendants incorporate their objections to Exhibit 5471		
5544			The New York Times article titled "After Nigeria Represses, Shell Defends Its Record" by Paul Lewis, dated 2/13/1996	Defendants incorporate their objections to Exhibit 5551		
5545	B3791	B3797	Amnesty International Nigeria A Summary of Human Rights Concerns, dated 3/1/1996	Irrelevant and prejudicial; there are no reports of violence relating to CNL; multiple levels of hearsay. FRE 401-403, 802		
5546	E-MB 02046	E-MB 02046	Article, "Nigerian Rights Hero On Trial for His Life," dated 3/6/96	Defendants incorporate their objections to Exhibit 5471		
5547	C20698	C20698	Email from NIGEC Gas Proj Supv to Nelson and others dated 4/20/1996 re: Security Incident on Parcel C	FRE 401, 403, 802		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5548	K03092	K03092	Article, "Former employee blows whistle on oil company Pollution warnings 'ignored by Shell' ," dated 3/13/96, by Pip Clothier and Eamon O'Connor	Defendants incorporate their objections to Exhibit 5471		
5549	K03044	K03054	Article, "Nigeria Crude: A hanged man and an oil-fouled landscape" dated 6/96, by Joshua Hammer	Defendants incorporate their objections to Exhibit 5471		
5550	K01295	K01295	Article, "Boycott sought on Nigerian oil" dated 6/27/96, by Roger Myers	Defendants incorporate their objections to Exhibit 5471		
5551			The Washington Post article titled "Nigeria Accused of Violations of Human Rights" dated 7/27/1996	Defendants do not have a copy of this exhibit because it was not produced during discovery and plaintiffs have not provided their proposed trial exhibits. Defendants reserve all rights to object. The exhibit was not produced to defendants in this litigation although it was responsive to discovery. FRE 401-403. See, e.g. Defs.' Ninth Set of Requests for Production, No. 3; see also <i>Wolk v. Green</i> , 2008 W.L. 298757, at *3 (precluding documents at trial not produced during discovery); see also <i>Pfingston v. Ronan Engineering Co.</i> , 284 F.3d 999, 1005 (9th Cir. 2002) (when party can show prejudice/unfair surprise as result of failure to disclose information in discovery, district court can properly bar reliance on its use in summary judgment); <i>Cambridge Electronics Corp. v. MGA Electronics, Inc.</i> , 227 F.R.D. 313, 323-24 (C.D. Cal. 2004) (same and noting "burden of showing harmlessness [of having failed to provide discovery] or substantial justification rests squarely on plaintiff"). Document is hearsay. FRE 802. Document is irrelevant and prejudicial. FRE 401-403		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5552	B4113	B4126	Amnesty International Nigeria Time to End Contempt for Human Rights dated 11/6/1996	Prejudice outweighs potential probative value; relates primarily to Shell activities and is irrelevant; multiple levels of hearsay. FRE 401-403, 802		
5553	B4295	B4297	Open letter from Amnesty International to the participants of the mission to Nigeria, 19-20 November 1996, of the Commonwealth Ministerial Action Group on the Harare Declaration	Irrelevant and prejudicial; there are no reports of violence relating to CNL and primarily concerns Ogoniland; multiple levels of hearsay. FRE 401-403, 802		
5554	KIOBEL 001454	KIOBEL 001468	Cover page, Tell, dated 11/18/96	Defendants incorporate their objections to Exhibit 5471		
5555	KIOBEL 001454	KIOBEL 001468	Article, "From the Editor," dated 11/18/96, by Nosa Igiebor	Defendants incorporate their objections to Exhibit 5471		
5556	KIOBEL 001454	KIOBEL 001468	Article, "There is Peace is Ogoniland...", dated 11/18/96, by Ima Niboro and Stepp Offi	Defendants incorporate their objections to Exhibit 5471		
5557	KIOBEL 001454	KIOBEL 001468	Article, "Our Eyes are Still Wet," dated 11/18/96, by Ledum Mitee	Defendants incorporate their objections to Exhibit 5471		
5558	KIOBEL 001454	KIOBEL 001468	Article, "Return of the 'Vultures' ," dated 11/18/96, by Stepp Offi	Defendants incorporate their objections to Exhibit 5471		
5559	KIOBEL 001454	KIOBEL 001468	Article, "Were Not 'Vultures' ," dated 11/18/96, by Celestine Meabe	Defendants incorporate their objections to Exhibit 5471		
5560	KIOBEL 001454	KIOBEL 001468	Article, "Once Upon an Execution," dated 11/18/96, by Yemi Awojuola	Defendants incorporate their objections to Exhibit 5471		
5561	KIOBEL 001454	KIOBEL 001468	Article, "Ill Hand Over in '98," dated 11/18/96, by Ade Olorunfewa	Defendants incorporate their objections to Exhibit 5471		
5562	C20682	C20689	Email from NIGEC Onshore Supt to Haastrup and others dated 11/29/1996 re: Ilaje Kidnap	Double Hearsay. FRE 802.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5563	C036414	C036415	Log of security incidents dated 12/1/1996	FRE 401, 403, 802, 901		
5564	B3798	B3812	U.S. Department of State Nigeria County Report on Human Rights Practices for 1996, dated 1/30/1997	Irrelevant and prejudicial; there are no reports of violence relating to CNL; multiple levels of hearsay. FRE 401-403, 802		
5565	K01519	K01531	Report, "Findings and Recommendations: Shell and Nigeria," dated March 1997	Defendants incorporate their objections to Exhibit 5471		
5566	B4127	B4130	Amnesty International Submission on Nigeria to the Commonwealth Ministerial Action Group on the Harare Declaration dated 4/30/1997	Irrelevant and prejudicial; there are no reports of violence relating to CNL; multiple levels of hearsay. FRE 401-403, 802		
5567			Associated Press article titled "Military steps up patrols on anniversary of aborted vote" by Frank Aigbogun dated 6/12/1997	Defendants incorporate their objections to Exhibit 5551		
5568	C039695	C039695	Report of Naval Officer Beating UP CFB #1 Engineer dated 6/24/1997	FRE 401, 403, 802, 901		
5569	C039696	C039696	Email from Orekoya to Smeaton dated 6/25/1997 re: Assault	FRE 401, 403, 802		
5570	C051221	C051228	Accounts of the Opuama/Leon Grigsby barge incident, dated 7/4/97	Double Hearsay. FRE 802.		
5571	C051220	C051220	Email from Mba to Uwaka and others dated 7/9/1997 re: Security Meeting Minutes Monday July 7, responding to email from Dunning to Neku	FRE 401, 403, 802		
5572	E-MB 00243	E-MB 00243	Multiple articles on one page, dated 7/11/97	Defendants incorporate their objections to Exhibit 5471		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5573	E-MB 00230	E-MB 00230	Article, "Again, CMAG Puts Nigeria in the Dock," dated 7/13/97, by Amanze Obi	Defendants incorporate their objections to Exhibit 5471		
5574	E-MB 00228	E-MB 00229	Article, "Don't disgrace us out of the Commonwealth," dated 7/13/97, by Kanle Oyatomi	Defendants incorporate their objections to Exhibit 5471		
5575	E-MB 00201	E-MB 00201	Article, "Detained Ogoni youths begin hunger strike," dated 8/12/97, by Joseph Ollor Obari	Defendants incorporate their objections to Exhibit 5471		
5576	E-MB 00206	E-MB 00206	Article, "UN special rapporteur on Nigeria declines job," dated 8/26/97	Defendants incorporate their objections to Exhibit 5471		
5577	E-MB 00297	E-MB 00298	multiple articles, dated 9/17/97	Defendants incorporate their objections to Exhibit 5471		
5578	E-MB 00295	E-MB 00296	Article, "Security Agencies Violate Human Rights-Nwokedi," dated 9/17/1997, by Chuke Okocha	Defendants incorporate their objections to Exhibit 5471		
5579	B3776	B3790	Amnesty International Nigeria No Significant Change - Human Rights Violations Continue, dated 9/27/1997	Irrelevant and prejudicial; there are no reports of violence relating to CNL; multiple levels of hearsay. FRE 401-403, 802		
5580	C040424	C040424	Log of security incident dated 12/2/1997	FRE 401, 403, 802, 901		
5581	B4131	B4135	Human Rights Watch World Report 1998 Nigeria Human Rights Developments	Report has multiple levels of hearsay. FRE 401-403. Report is irrelevant to plaintiffs' claims and is prejudicial. The document does not address any CNL activities. FRE 401-403		
5582			The New York Times article titled "Nigeria, in Free Fall, Seethes Under Generals" by Howard W. French, dated 4/4/1998	Defendants incorporate their objections to Exhibit 5551		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5583			The Washington Post article titled "Protests Mount in Oil-Rich Nigerian Delta; Poor Tribal Communities Seek Share of Billions Pumped from Their Lands" by James Rupert, dated 4/8/1998	Defendants incorporate their objections to Exhibit 5551		
5584			The Washington Post article titled "Nigeria Frees 142 Prisoners; Civil Rights Groups Continue Criticism" dated 5/8/1998	Defendants incorporate their objections to Exhibit 5551		
5585			The Washington Post article titled "Mobil Chief Scolded for Operating in Nigeria" by Martha Hamilton, dated 5/15/1998	Defendants incorporate their objections to Exhibit 5551		
5586	C117310	C117312	Email from Kirkland to Haastrup and others dated 10/26/1998 re: Incident last night - Community Situation	FRE 401, 403, 802		
5587	C039491	C039492	Letter from Walvis Workers to Chevron Nigeria LTD dated 1/25/1999 re: Chevron Nigeria Soldiers threat to Walvis Workers	Letter dated 1/25/99 unrelated to Parabe is irrelevant, waste of time and hearsay. FRE 401-403, 802.		
5588	B3832	B3857	U.S. Department of State Nigeria County Report on Human Rights Practices for 1998, dated 2/26/1999	Multiple levels of hearsay. Prejudice outweighs any potential probative value. FRE 401-402, 802		
5589			Article entitled "Nigeria" by the County Reports on Human Rights Practices 2004, dated 2/28/2005	Defendants incorporate their objections to Exhibit 5551		
5590			U.S. State Department Report "Background Note: Nigeria," dated August 2005	Defendants incorporate their objections to Exhibit 5551		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5591			Chevron statement re: Chevron's support for human rights	Defendants do not have a copy of this exhibit because it was not produced during discovery and plaintiffs have not produced a copy of their proposed trial exhibits. Defendants therefore reserve our right to further object once a copy of this exhibit is produced. The objections stated below address the document as briefly described. Document is hearsay. FRE 802. Document is irrelevant and misleading in part because it is unclear what time period applies. FRE 401-403.		
5592			The Voluntary Principles on Security and Human Rights + Introduction - WITHDRAWN	Defendants do not have a copy of this exhibit because it was not produced during discovery and plaintiffs have not produced a copy of their proposed trial exhibits. Defendants therefore reserve our right to further object once a copy of this exhibit is produced. The objections stated below address the document as briefly described. Document is hearsay. FRE 401-403, 802. Voluntary Principles are irrelevant and misleading because they were not created until after the Parabe Incident. FRE 401-403. Document should be excluded as a subsequent remedial measure. FRE 407		
5593			U.S. Department of State report titled "Nigeria: Security Assistance"	Plaintiffs have not identified this proposed exhibit with enough specificity for defendants to object, so defendants preserve all objections. Hearsay. FRE 802.		
5594	KIOBEL001 631	KIOBEL 001814	"The Report of the Hon-Justice Opubo Inko-Tariah(RTD) Judicial Commission of Inquiry into Umuechem Massacre of Nov. 1990 and The River State Government White Paper on the Issue:	Defendants incorporate their objections to Exhibit 5471		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5595	C22894	C22894	Email from Neku to Kirkland and others dated 1/10/1996 re: Invasion of Mallard Bay Rig			
5596	C22888	C22893	Email from Kirkland to Taylor dated 1/22/1996 re: Mallard Bay 71, 8 Jan 96 Hostage Incident			
5597	C20835	C20836	Email from Omole to Lee and others dated 3/1/2000 re: Invasion of mallard bay 74 rig, with email chain	Email dated 3/1/00 unrelated to Parabe is irrelevant, waste of time and hearsay. FRE 401-403, 802.		
5598	C20571	C20572	Memo from Schull (signed for Kirkland) to Ramdas, dated 4/23/98, re: Extension: Standing Contract No. LGST-94-12	Extension of Modant Marine contract effective June 1998 is irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
5599	C20588	C20588	Memo from Schull to Seacor Marine Inc/West Africa Offshore Limited, dated 4/6/99, re: Extension: Charter Party Contract Contract No. LGST-96-1394	1999 contract is irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
5600	C20617	C20634	Agreement between Lion Enterprises Establishment & Pan African Airlines and CNL, dated 1/11/94, re: Helicopter Service Agreement			
5601	C20609	C20610	Memo from Schull to Lion Enterprise Establishment & Pan African Airlines, dated 12/23/98, re: Extension: Helicopter Agreement Contract No Lgst 94-13 (formerly Lgst 94-01)	Contract dated 12/1998 is irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5602	C20611	C20612	Memo from Schull (signed for Kirkland) to Raval, dated 4/23/98, re: Extension: Helicopter Services Agreement No. LGS-94-13 (LGST-94-01)			
5603	C20653	C20681	Contract between Sea trucks Nigeria Limited & Sea Trucks Offshore Limited and Chevron Nigeria Limited	1996 Sea Trucks contract is irrelevant, too remote in time, would confuse the jury and cause undue delay. FRE 401-403.		
5604	C040950	C040951	Receipt for Sea Trucks Offshore Limited dated 1/27/1997	1997 Sea Trucks documents are irrelevant, too remote in time, would confuse the jury and cause undue delay. FRE 401-403.		
5605	C25101	C25130	Receipts from Sea Trucks Offshore Limited for 9 inland water boats dated 11/29/1998	1998 Sea Trucks documents are irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
5606	C25067	C25130	Receipts for Sea Trucks dated 11/30/98	1998 Sea Trucks documents are irrelevant, would confuse the jury and cause undue delay. FRE 401-403.		
5607	C20651	C20651	Letter from Schull to Sea Trucks Nigeria Limited and Sea Trucks Offshore Limited dated 5/26/1999 re: Operation & Maintenance of CNL Jet Drive Vessels	1999 Sea Trucks documents are irrelevant, too remote in time, would confuse the jury and are an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		
5608	C20652	C20652	Letter from Schull to Sea Trucks Nigeria Limited and Sea Trucks Offshore Limited dated 5/26/1999 re: Operation & Maintenance of CNL Jet Drive Vessels	1999 Sea Trucks documents are irrelevant, too remote in time, would confuse the jury and are an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		
5609	C20649	C20650	Letter from Wilcox to Sea Trucks Nigeria Limited and Sea Trucks Offshore Limited dated 6/13/1999 re: Contractor Service Contract	1999 Sea Trucks documents are irrelevant, too remote in time, would confuse the jury and are an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5610	C20557	C20564	Standing contract between CNL and Walvis Nigeria Limited & Walvis Int'l C.I. Ltd, dated date effective 2/17/97	1997 Walvis Contract is irrelevant, too remote in time, would confuse the jury and cause undue delay. FRE 401-403.		
5611	C2921	C2927	Contractor Service Agreement between Chevron Nigeria Limited and McDermott-ETPM West, Inc and Globestar Engineering Co., dated 11/3/1995	1995 document is too remote. FRE 401-403.		
5612	C2928	C2936	Amendment to the Contractor Service Agreement No. FAC - 95 - 1298 between Chevron Nigeria Limited ("Company") and McDermott-ETPM West, Inc., and Globestar Engineering Company (Nigeria) Limited ("Contractor"), re: changes in agreement, dated 11/3/1985	1985 document is too remote. FRE 401-403.		
5613	C3026	C3027	Amendment Number 6 to the Contractor Service Agreement No. FAC -95 - 1298 between Chevron Nigeria Limited ("Company") and McDermott ETPM West, Inc and Globestar Engineering Co. (Nig.) Ltd. ("Contractor"), dated 1/14/1999	1999 amendment to contract is irrelevant, too remote in time, and would confuse the jury. FRE 401-403.		
5614	C20922	C20924	Military payments dated 5/5/1998			
5615	C20919	C20919	Military payment dated 5/25/98			
5616	C20920	C20920	Military Payments dated 6/1/1998			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5617	C21056	C21058	Military Payments dated 7/29/1998	Payment dated July 29, 1998 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
5618	C28864	C28866	Military Payments dated 1/7/1999	Payment dated Jan. 7, 1999 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
5619	C30034	C30034	Military Payments dated 1/11/1999	Payment dated Jan. 11, 1999 unrelated to Parabe is irrelevant, waste of time. FRE 401-403.		
5620			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5621			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5622			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5623			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5624			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5625			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5626			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5627			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5628			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5629			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5630			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5631			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5632			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5633			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5634			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5635			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5636			Military Payments, exemplars	Military payments unrelated to Parabe are irrelevant, unduly prejudicial and a waste of time. FRE 401-403.		
5637			Declaration of A.O. Haastrup in Support of Defendants' Motion to Dismiss	Hearsay. FRE 802.		
5638			Declaration of Scott Davis in Support of Defendants' Motion for Summary Judgment (Phase One)	Hearsay. FRE 802.		
5639			Declaration of Thomas Schull in Support of Defendants' Motion For Summary Judgment (Phase I), dated 2/24/03	Hearsay. FRE 802.		
5640			Declaration of David J. Connor in Support of Defendants' Motion for Summary Judgment (Phase I)	Hearsay. FRE 802.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5641			Declaration of George L. Kirkland in Support of Defendants' Motion for Summary Judgment (Phase I)	Hearsay. FRE 802.		
5642			Declaration of A.O. Haastrup in Support of Defendants' Motion for Summary Judgment (Phase One)	Hearsay. FRE 802.		
5643			Declaration of Loyd Richard Brown in Support of Defendants' Motion for Summary Judgment (Phase One)	Hearsay. FRE 802.		
5644			Declaration of Frank G. Soler in Support of Defendants' Motion for Summary Judgment on Tertiary Liability	Hearsay. FRE 802.		
5645			Declaration of Rex Mitchell in Support of Defendants' Summary Judgment Motions	Hearsay. FRE 802.		
5646			Declaration of Thomas Schull in Support of Defendants' Summary Judgment Motions	Hearsay. FRE 802.		
5647			Declaration of Gary Hagstrom in Support of Defendants' Motion for Summary Judgment on Tertiary Liability	Hearsay. FRE 802.		
5648			Declaration of Scott Davis in Support of Defendants' Summary Judgment Motions	Hearsay. FRE 802.		
5649			Declaration of David J. Connor in Support of Defendants' Summary Judgment Motions	Hearsay. FRE 802.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5650			Declaration of Loyd Richard Brown in Support of Defendants' Summary Judgment Motions	Hearsay. FRE 802.		
5651			Declaration of David Heilbron dated 5/9/05			
5652			Declaration of Darrell W. Grimsley dated 5/5/05			
5653			Declaration of Seth Schoen in Opposition to Defendants' Summary Judgment Motion			
5654			Chart prepared by Margaret Staines identified in her Declaration in Opposition to Defendants' Summary Judgment Motion paragraph 3			
5655			Declaration of Margaret Staines in Opposition to Defendants' Summary Judgment Motion			
5656			Declaration	Exhibit was not provided; declaration is hearsay. FRE 802.		
5657			Declaration	Exhibit was not provided; declaration is hearsay. FRE 802.		
5658			Declaration	Exhibit was not provided; declaration is hearsay. FRE 802.		
5659	C074220	C074228	Dredging Costs (1995 to 1996); Gbokoda/Dibi Field Survey, Land Acquisition and Dredging Schedules; Comparison of Dredging Costs (BWI/Chevron vs BWI/X), date range 10/1/94-8/1/97	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. Dredging documents are unduly prejudicial, irrelevant and would mislead the jury. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5660	C074471	C074471	Weekly Project Reports, Project: Swamp Dredging, date range 2/5/96-10/28/96	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. Dredging documents are unduly prejudicial, irrelevant and would mislead the jury. FRE 401-403.		
5661	C074281	C074313	Swamp Rig Move Form, dated 2/12/96, re: Mallard Bay Rig #71, w/ attached move forms for multiple dates and locations	Documents regarding swamp rig moves are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5662	C074769	C075018	Final Report of the Environmental Impact Assessment for the Benin River Field Development Project, dated March 1996	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210. Partial dupe of 2735 (Adekunle)		
5663	C074189	C074189	Memo from Hagstrom to Omole etc., dated 5/6/96, re: Land Acquisition for the Flowline Route from Benin River 7 to Gbokoda 'D' and 'E' Locations	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5664	C074218	C074218	Memo from Hagstrom to Omole etc., dated 5/6/96, re: Land Acquisition for Dibi 'D' and 'F' Location	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5665	C107993	C107994	Notice from S&E Supervisor to Field Supervisors, dated 7/7/96, re: Effluent Water Discharge Non-Compliance Notification	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
5666	C074185	C074185	Memo from Hagstrom to Jakpa etc., dated 11/6/96, re: Land Acquisition fro Benin River	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5667	C074243	C074243	Memo from Hagstrom to Jakpa etc., dated 11/29/96, re: Land Acquisition for Gbokoda 'H' Location	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5668	C074236	C074236	Memo from Hagstrom to Jakpa etc., dated 12/4/96, re: Land Acquisition for Additional R.O.W. to existing flowline...	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5669	C074203	C074203	Memo from Hagstrom to Jakpa etc., dated 12/10/96, re: Land Acquisition for Dibi 'G' Location	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5670	C074235	C074235	Memo from Hagstrom to Jakpa etc., dated 12/17/96, re: Land Acquisition for Gbokoda 11-4-4D Location	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5671	C074323	C074323	Memo from Hagstrom to Jakpa etc., dated 1/1/97, re: Land Acquisition for RMP #7, 8, 10, and 17	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5672	C074330	C074330	Memo from Hagstrom to Jakpa etc., dated 1/22/97, re: Land Acquisition for RMP #14 and WIM-1	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5673	C074278	C074280	Email from Walker to NIGEC Aiyenuberu etc., dated 1/23/97, re: RMP 2 Cluster, with email string	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5674	C074274	C074278	Memo from Hagstrom to Jakpa etc., dated 2/4/97, re: Land Acquisition for Olero Creek Flowstation Area, with attached Olero Creek/Dibi Project, Site Preparation Cost Summary, dated 7/15/97	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5675	C074316	C074316	Memo from Hagstrom to Jakpa etc., dated 2/14/97, re: Land Acquisition for RMP #15	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5676	C074190	C074190	Memo from Hagstrom to Jakpa etc., dated 2/26/97, re: Land Acquisition for Dibi 4/4/RMP20 Spoil Dump Area	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5677	C074244	C074246	Swamp Rig Move Form, dated 3/3/97, re: Mallard Bay 71	Documents regarding swamp rig moves are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5678	C074176	C074178	Chevron Nigeria Limited, Appropriation Request, dated 3/17/97, re: RMP 14 Site Preparation	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5679	C074314	C074314	Memo from Hagstrom to Jakpa etc., dated 3/18/97, re: Acquisition of Extra Land between RMP#2 and Benin River V Canal	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5680	C074204	C074211	Swamp Rig Move Forms, re: Mallard Bay and Searex IV in 1997 & 1998	Documents regarding swamp rig moves are irrelevant, unduly prejudicial and would mislead the jury and are an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		
5681	C074332	C074332	Chevron Texaco Drilling Database Well List, date range from 3/23/97-5/2/00	Documents regarding drilling database and wells are irrelevant, unduly prejudicial and would mislead the jury. 1997, 1999-2000 documents are too remote in time. FRE 401-403.		
5682	C108038	C108111	Report, Environmental Study of OML 49, dated April 1997	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
5683	C074315	C074315	Memo from Hagstrom to Jakpa etc., dated 4/2/97, re: Land Acquisition for RMP #13	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5684	C075019	C075189	Environmental Impact Assessment Report for the Ewan Offshore Field Development Project Submitted to Chevron (Nigeria) Limited, dated May 1997	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
5685	C074317	C074317	Memo from Hagstrom to Jakpa etc., dated 5/12/97, re: Land Acquisition for RMP 18 Location	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5686	C074325	C074329	Swamp Rig Move Form, dated 5/26/97 (&1/20/97), re: Mallard Bay 71	Documents regarding swamp rig moves are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5687	C074234	C074234	Memo from Hagstrom to Jakpa etc., dated 6/26/97, re: Land Acquisition for Gbokoda 5/6 Location	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5688	C074181	C074184	Memo from Hagstrom to Jakpa etc., dated 8/11/97, re: Land Acquisitions for Benin River "U"	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5689	C074163	C074166	Olero Creek/Dibi Development Project Schedule for Survey, Land Acquisition and Dredging, date 8/12/97	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5690	C074230	C074233	Olero Creek/Dibi Development Project Schedule for Survey, Land Acquisition and Dredging	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. Dredging documents are unduly prejudicial, irrelevant and would mislead the jury. FRE 401-403.		
5691	C074213	C074213	Memo from Hagstrom to Jakpa etc., dated 8/26/97, re: Land Acquisition for Dibi Flowstation Water Source Cluster and Flare Extension	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. Documents regarding flaring are unduly prejudicial, irrelevant and would mislead the jury. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5692	C074200	C074202	Budget Estimates for New Locations in Dibi Field, dated 9/2/97	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5693	C074214	C074217	Indicative Budget for Escravos Dehydration Slot, and Budget Estimates for New Locations in Dibi Field, dated 9/2/97	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5694	C074219	C074219	Memo from Hagstrom to Jakpa etc., dated 11/19/97, re: Additional Land Acquisition for Dibi 'L' Location	Documents regarding land acquisition are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5695	C074170	C074172	1998 Dredging Schedule (Tentative), date range 12/21/97-12/23/98, and Olero Creek/Dibi Development Project Schedule for Survey, Land Acquisition and Dredging, date 1/9/98	Documents regarding land acquisition are irrelevant, unduly prejudicial, would mislead the jury and are an attempt to back door Opia and Ikenyan evidence. Documents regarding dredging are unduly prejudicial and would mislead the jury. FRE 401-403.		
5696	C074324	C074324	Memo from Hagstrom to Jakpa etc., dated 1/9/98, re: Land Acquisition for Dibi Flowstation Water Source Cluster	Documents regarding land acquisition are irrelevant, unduly prejudicial, would mislead the jury and are an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		
5697	C074237	C074239	Swamp Rig Move Form, dated 2/7/98, re: Mallard Bay 74	Documents regarding swamp rig moves are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5698	C074182	C074184	Swamp Rig Move Form, dated 2/23/98, re: Mallard Bay 74	Documents regarding swamp rig moves are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5699	C074331	C074331	Weekly Report- March 23, 1998	Dredging documents are unduly prejudicial, irrelevant, would mislead the jury and are an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5700	C107958	C107992	Draft Terms of Reference, Scope or Work and Project Description for Environmental Impact Assessment (EIA) for Dredging of Access Creek from Benin River to Bateren, Ebrohimi and Obaghoro Villages, dated 4/1998, by CNL	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
5701	C074251	C074273	Swamp Rig Move Form, dated 4/7/98, re: Mallard Bay 74, w/ attached move forms for multiple dates and locations	Documents regarding swamp rig moves are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5702	C108846	C109106	Final Report of the Environmental Impact Assessment for the Dibi Oil Field Development Project, dated May 1998	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
5703	C074212	C074212	Memo from Orji to Eldridge, dated 5/7/98, re: Service Contract No. F051216	Service contract regarding dredging is irrelevant, unduly prejudicial and would mislead the jury. FRE 401-403.		
5704	C074186	C074188	Swamp Rig Move Form, dated 6/24/98, re: Mallard Bay 74	Documents regarding swamp rig moves are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5705	C074191	C074199	Swamp Rig Move Forms, dated 7/15/98 and 6/12/98, re: Searex IV	Documents regarding swamp rig moves are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5706	C108112	C108443	Final Report of the Environmental Impact Assessment for the Dibi Oil Field Development Project, dated August 1998	Document dated Aug. 1998 unrelated to Parabe is irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5707	C074575	C074580	Fax from Redwine to Adeoye etc., dated 8/20/98, re: Installation of Two Concrete Barges for Phase B..., w/ multiple attached decline letters	Documents regarding concrete barges for Dibi project are irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5708	C074581	C074582	Bid Summary Master, dated 8/25/98, re: Installation of Two Concrete Barges Olero Creek/Dibi	Documents regarding concrete barges for Dibi project are irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5709	C108444	C108716	Draft Report for the Environmental Impact Assessment of the Escravos Gas Project Phase 2 (EGP-2), dated September 1998, submitted by CNL	Document dated Sept. 1998 unrelated to Parabe is irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
5710	C074573	C074573	Letter from Kirkland to Group Executive Director, NAPIMS, dated 9/9/98, re: Olero Creek/Dibi Development Project...	Letter regarding development of Dibi project is irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5711	C074574	C074574	Letter from Eldridge to Schull etc., dated 9/9/98, re: Contract Award Approval...	Letter regarding development of Dibi project is irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5712	C074167	C074169	Swamp Rig Move Form, dated 9/25/98, re: Mallard Bay 74	Documents regarding swamp rig moves are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5713	C074335	C074468	Chevron Texaco Drilling Activity Report (multiple reports), date range 10/9/98-12-23/98	Over 100 pages of drilling reports in irrelevant time frame is unduly prejudicial, would mislead the jury, cause undue delay and is an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		
5714	C074322	C074322	Memo from Eldridge to Jakpa etc., dated 10/12/98, re: Land Acquisition for RMP and WIM 4 Locations	Documents regarding land acquisition are irrelevant, unduly prejudicial, would mislead the jury and are an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5715	C074483	C074523	Installation of Two (2) Concrete Barges for Phase B of the Olero Creek/Dibi Development Project, General Business and Legal Requirements	Documents regarding concrete barges for Dibi project are irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5716	C074524	C074558	Installation of Two (2) Concrete Barges for Phase B of the Olero Creek/Dibi Development Project, Project Specification	Documents regarding concrete barges for Dibi project are irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5717	C074502	C074523	Installation of Two (2) Concrete Barges for Phase B of the Olero Creek/Dibi Development Project, and exhibits, dated 11/1/98	Documents regarding concrete barges for Dibi project are irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5718	C074240	C074240	Memo from Orji to Eldridge etc., dated 11/26/98, re: Service Contract No. F002227	November 1998 dredging contract is irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5719	C074560	C075466	CNL/Olero Creek. Dibi Development Project, Kick-Off Meeting Minutes, Nigerian Dredging and Marine Ltd., dated 12/15/98	December 1998 meeting regarding dredging is irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5720	C074567	C074572	Memo from Simpson to Smalbil etc., dated 12/28/98, re: Installation of Two (2) Concrete Barges (NCS, SCS)	Documents regarding concrete barges for Dibi project are irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5721	C0573	C0574	Chevron Statement, dated 9/8/2000, re: Chevron and Nigerian National Petroleum Corp. Launch Major Initiative To Put Out Gas Flares and Convert Natural Gas Into Clean Fuels	News release dated Sept. 2000 unrelated to Parabe is irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5722	C074472	C074474	Swamp Drilling Program (1995-1998), Mallard Bay Rig 71	Documents regarding swamp rig moves and drilling program are irrelevant, unduly prejudicial and would mislead the jury. Portions of the exhibit are too remote in time and other portions are an attempt to back door Opia and Ikenyan evidence. FRE 401-403.		
5723	C074469	C074470	Chart, CNL Spills- North Offshore Area (NOA) and N. Onshore facilities 1996-2000	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210. Dupe of 2732 (Adekunle)		
5724	C074173	C074175	Swamp Rig Move Form, dated 6/16/97, re: Mallard Bay 71	Documents regarding swamp rig moves are irrelevant, unduly prejudicial and would mislead the jury. Documents are too remote in time. FRE 401-403.		
5725	C108000	C108037	Chevron Texaco Mud Products Summary (multiple dates, locations, and rigs)	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
5726	C074229	C074229	Document entitled, "Previous Negotiations of Hyperinflation Claims"	Documents regarding dredging budget are irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5727	C074241	C074241	Indicative Budget for Gbokoda E Extension	Documents regarding dredging budget are irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5728	C074247	C074250	Facilities Engineering, Lekki, Project Expenditure Chart, re: Gbokoda/Dibi Field Development	Documents regarding dredging budget are irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5729	C074275	C074275	Budget Estimate for Dredging of Opuekeba Canals	Documents regarding dredging budget are irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5730	C074475	C074481	Compliance & Regulatory Unit (1997 Work Plan)	Documents regarding environmental audits and compliance are irrelevant. Exhibit is irrelevant, unduly prejudicial, confusing and too remote in time. FRE 401-403. The only permissible of the alleged agency relationship is one "relevant to the plaintiff's claim of wrongdoing" – security-related decision making with respect to the Parabe incident. Bowoto, 312 F. Supp. 2d at 1240 (quoting Phoenix Canada Oil Co. v. Texaco, Inc., 842 F.2d 1466, 1477 (3d Cir. 1988)). Actions required by law cannot be evidence of agency, including SEC reporting, preparation of annual reports and consolidated financial statements, and general accounting practices and controls required by same. See Sonora Diamond Corp. v. Super. Ct., 83 Cal. App. 4th 523, 551 (Cal. Ct. App. 2000); U.S. v. Bestfoods, 524 U.S. 51, 71-72 (1998); see also Calvert v. Huckins, 875 F. Supp. 674, 679 (E.D. Cal. 1995). See also Jury Instrs. (Dkt. 1837), p. 158.		
5731	C074583	C074768	Report, Environmental Guidelines and Standards for the Petroleum Industry in Nigeria, dated 1991	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
5732	C107920	C107957	Report, A Primer of Oilwell Drilling, 5th Edition, Revised, dated 1996, by Ron Baker	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
5733	C107997	C107999	Facilities Engineering, Lekki, Project Expenditure Chart, re: Dredging West	Documents regarding dredging expenditures are irrelevant, unduly prejudicial, remote in time and would mislead the jury. FRE 401-403.		
5734	C108717	C108845	Draft Report, Environmental Impact Assessment of the Abiteye-Opuekeba Pipeline Project	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5735	C109107	C109147	Reports by Season	Confusing, irrelevant, waste of time. FRE 401-403.		
5736	C109148	C109284	Draft Report, Environmental Impact Assessment of the Abiteye-Opuekeba Pipeline Project	Irrelevant, waste of time, prejudicial. FRE 401-403; see also Order Granting in Part Defs.' Mot. in Limine to exclude Testimony re Environmental Issues, Dkt. 1210.		
5737			Stipulation Regarding information in Documents Bates Labeled C30031-C30034, C30053-C30054 and C30085, dated 9/23/2005, REDACTED, with attached chart re: Chevron to GSF Payment index from 5/1/1999-8/1/1999			
5738	B01008	B01011	Chevron in Nigeria (a Chevron publication dated 5/1998)			
5739	C19289	C19291	Email chain dated 3/24/99 re: Letter to Ms. Manby			
5740	C2890	C2897	Letter from Matzke to Kelly (Berkeley City Clerk) dated 4/2/99 forwarding Chevron's response to Kucinich's call for an investigation into Nigerian activities			
5741			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5742			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5743			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5744			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5745			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5746			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5747			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5748			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5749			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5750			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5751			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5752			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5753			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5754			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5755			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5756			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5757			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5758			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5759			Stipulation Between the Parties	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5760			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5761			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5762			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5763			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5764			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5765			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5766			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5767			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5768			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5769			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5770			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5771			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5772			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5773			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5774			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5775			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5776			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5777			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5778			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5779			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5780			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5781			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5782			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5783			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5784			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5785			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5786			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5787			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5788			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5789			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5790			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5791			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5792			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5793			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5794			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5795			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5796			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5797			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5798			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5799			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5800			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5801			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5802			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5803			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5804			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5805			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5806			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5807			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5808			Documents relied on by Freeman	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5809			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5810			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5811			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5812			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5813			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5814			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5815			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5816			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5817			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5818			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5819			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5820			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5821			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5822			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5823			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5824			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5825			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5826			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5827			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5828			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5829			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5830			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5831			Documents relied on by Freed	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5832			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5833			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5834			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5835			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5836			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5837			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5838			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5839			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5840			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5841			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5842			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5843			Documents relied on by Ebert	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5844			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5845			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5846			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5847			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5848			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5849			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5850			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5851			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5852			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5853			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5854			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5855			Documents relied on by Van Zandt	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5856			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5857			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5858			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5859			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5860			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5861			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5862			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5863			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5864			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5865			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5866			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5867			Documents relied on by Babalakin	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5868			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5869			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5870			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5871			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5872			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5873			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5874			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5875			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5876			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5877			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5878			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5879			Documents relied on by Obafunwa	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5880			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5881			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5882			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5883			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5884			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5885			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5886			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5887			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5888			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5889			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5890			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5891			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5892			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5893			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5894			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5895			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5896			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5897			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5898			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5899			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5900			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5901			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5902			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5903			Documents relied on by Wells	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5904			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5905			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5906			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5907			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5908			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5909			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5910			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5911			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5912			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5913			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5914			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5915			Documents relied on by Ronn	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5916			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5917			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5918			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5919			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5920			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5921			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5922			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5923			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5924			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5925			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5926			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5927			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5928			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5929			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5930			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5931			Documents relied on by Watts	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5932			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5933			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5934			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5935			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5936			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5937			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5938			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5939			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5940			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5941			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5942			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5943			Documents relied on by Prescott	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5944			Documents relied on by McGowan	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5945			Documents relied on by McGowan	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5946			Documents relied on by McGowan	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5947			Documents relied on by McGowan	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5948			Documents relied on by McGowan	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5949			Documents relied on by McGowan	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5950			Documents relied on by McGowan	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5951			Documents relied on by McGowan	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5952			Documents relied on by McGowan	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5953			Documents relied on by McGowan	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5954			Documents relied on by McGowan	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5955			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5956			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5957			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5958			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5959			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5960			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5961			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5962			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5963			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5964			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5965			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5966			Documents relied on by Glassner	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5967			Documents relied on by Ipser	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5968			Documents relied on by Ipser	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5969			Documents relied on by Ipser	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5970			Documents relied on by Ipser	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5971			Documents relied on by Ipser	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5972			Documents relied on by Ipser	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5973			Documents relied on by Ipser	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5974			Documents relied on by Ipser	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5975			Documents relied on by Ipser	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5976			Documents relied on by Ipser	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5977			Documents relied on by Ipser	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5978			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5979			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5980			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5981			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5982			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5983			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5984			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5985			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5986			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5987			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5988			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5989			Documents relied on by Sagay	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5990			Plaintiffs' Summary of Partial Evidence Regarding Chevron Nigeria Payments to the Military and Police (1/2/98 - 1/30/99)			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
5991			Plaintiffs' Summary of Partial Evidence Regarding Written Communications Between Chevron Nigeria Ltd. And Other Chevron Entities from 1/1/96 to 10/13/98			
5992			Plaintiffs' Summary of Partial Evidence Regarding Chevron Personnel Involved in International Communications, 5/28/98 - 10/15/98			
5993			Plaintiffs' Summary of Partial Evidence Regarding Chevron Calls Per Day from U.S. to Nigeria, 11/19/97 to 1/19/99			
5994			Plaintiffs' Summary of Partial Evidence Regarding Chevron Calls Per Day from U.S. to Nigeria, 5/20/98 to 6/20/98			
5995			Plaintiffs' Summary of Partial Evidence Regarding Employment Histories and Changes in Position			
5996			Plaintiffs' Summary of Partial Evidence Regarding Overlapping Chevron Officers, Directors & Managers			
5997			Plaintiffs' Summary of Partial Evidence Regarding Confusion Over Identity of Chevron Employer			
5998			Summary of voluminous documents	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
5999			Summary of voluminous documents	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
6000			Summary of voluminous documents	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
6001			Summary of voluminous documents	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
6002			Summary of voluminous documents			
6003	B8964	B8964	Photograph of Arolika Irowarinun			
6004	B9085	B9085	Wedding photograph of Bola Oyinbo and Ola Oyinbo			
6005	B9086	B9086	Photograph of Bola Oyinbo and Ola Oyinbo			
6006	B9090	B9090	Photograph of Bola Oyinbo with Bayo Oyinbo			
6007	B8979	B8979	Photograph of Methuselah Aiyenumelo and Bassey Jeje			
6008	B9113	B9113	Photograph of Bassey Jeje with wife and children			
6009	B9049	B9049	Photograph of Bassey Jeje with wife and children			
6010	B9020	B9020	Photograph of Larry Bowoto with wife and children			
6011	B9018	B9018	Photograph of Larry Bowoto with children			
6012	B9014	B9014	Photograph of Ola, Deji and Bayo Oyinbo,			
6013			Ed Kashi Photo - Wood Floor With Buckets			
6014			Ed Kashi Photo - Wood Floor With Women and Baby			
6015			Ed Kashi Photos			
6016			Ed Kashi Photos			
6017			Ed Kashi Photos			
6018			Ed Kashi Photos			
6019			Ed Kashi Photos			
6020			Ed Kashi Photos			

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
6021			Ed Kashi Photos			
6022			Ed Kashi Photos			
6023			Ed Kashi Photos			
6024			Ed Kashi Photos			
6025			Ed Kashi Photos			
6026			Ed Kashi Photos			
6027			Ed Kashi Photos			
6028			Ed Kashi Photos			
6029			Ed Kashi Photos			
6030			Ed Kashi Photos			
6031			Ed Kashi Photos			
6032			Ed Kashi Photos			
6033			Nigeria Map			
6034			Nigeria Map			
6035			Nigeria Map			
6036	B00013	B00014	Letter from Ilaje Coastal Development Youth Organisation dated December 13, 1994			
6037			George Steinmetz Photo - Flare and Palm Trees			
6038			George Steinmetz Photo - Boy With Pot on Head			
6039			George Steinmetz Photo - Boy With Fishing Net			
6040			George Steinmetz Photo - Aerial of River			
6041			George Steinmetz Photo - Aerial With Fires			
6042			George Steinmetz Photo - Aerial With Fire			
6043			George Steinmetz Photo - Aerial of the River			
6044			Timeline - Ilaje Attempts to Meet with Chevron			
6045			Charts, Timelines or Other Demonstrative Exhibits	Defendants were not provided with this exhibit and reserve all their rights to object to it.		

PLAINTIFFS' EXHIBITS (5,000-8,000)						
Ex. #	Beginning Bates	Ending Bates	Description	Objection	Admitted or Not Admitted	Date Admitted
6046			Charts, Timelines or Other Demonstrative Exhibits	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
6047			Charts, Timelines or Other Demonstrative Exhibits	Defendants were not provided with this exhibit and reserve all their rights to object to it.		
6048			Excerpt of Chevron 2007 Annual Report			
6049			Excerpt of 2007 Supplement to the Annual Report of Chevron Corporation			
6050			Chevron: Financial Fundamentals			
6051			Chevron News Release, "Chevron Reports Second Quarter New Income of \$6 Billion, up 11 Percent from \$5.4 Billion in Second Quarter 2007," dated 8/1/08, with attachment entitled "Chevron Corporation - Financial Review"			
6052			Excerpt of U.S. Securities and Exchange Commission, Form 10-Q for Chevron Corporation, dated 8/7/08			